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Environmental
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**Responses to
First Request for Information
from
U.S. EPA
CERCLA Section 104(e)
Portland Harbor Superfund Site**

Respondent

Consolidated Metco, Inc.
13940 North Rivergate Boulevard
Portland, Oregon 97203

May 14, 2008

USEPA SF



1352611

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Section 1.0 Respondent Information

1. *Provide the full legal, registered name and mailing address of Respondent.*

Response 1. Consolidated Metco, Inc.
13940 North Rivergate Boulevard
Portland, Oregon 97203

2. *For each person answering these questions on behalf of Respondent, provide:*

- a. *full name;*
- b. *title;*
- c. *business address; and*
- d. *business telephone number, electronic mail address, and FAX machine number.*

Response 2. Ernie Nimister
Manager of Environmental Compliance and Safety
Consolidated Metco, Inc.
13940 North Rivergate Boulevard
Portland, Oregon 97203

Telephone (503) 240-5493
Facsimile (503) 240-5443
e-Mail ENimister@ConMet.com

3. *If Respondent wishes to designate an individual for all future correspondence concerning this Site, please indicate here by providing that individual's name, address, telephone number, fax number, and, if available, electronic mail address.*

Response 3. Please see Response to Question 2, above.

Section 2.0 Owner/Operator Information

4. *Identify each and every Property that Respondent currently owns, leases, operates on, or otherwise is affiliated or historically has owned, leased, operated on, or otherwise been affiliated with within the Investigation Area during the period of investigation (1937-Present). Please note that this question includes any aquatic lands owned or leased by Respondent.*

Response 4. Consolidated Metco, Inc. (ConMet) now owns and has historically owned one property at 13940 North Rivergate Boulevard within the Investigation Area (Property).

5. *Provide a brief summary of Respondent's relationship to each Property listed in response to Question 4 above, including the address, Multnomah County Alternative Tax lot Identification number(s), dates of acquisition, period of ownership, lease, operation, or affiliation, and a brief overview of Respondent's activities at the Properties identified.*

Response 5. The Property located at 13940 North Rivergate Boulevard is comprised of two parcels. ConMet acquired the two parcels (Tax Lot 300 and Tax Lot 400) from the Port of Portland in 1964 and 1966, respectively. Consolidated Metco, Inc. has been the owner of the property from the purchase dates to present.

Parcel 1 Multnomah County Tax Lot: Section 26, 2N, 1W, Tax Lot 300 (~10.00 acres). Consolidated Metco, Inc. acquired from Port of Portland on May 8, 1964.

Tax Account No. R325201.

Parcel 2 Multnomah County Tax Lot: Section 26, 2N, 1W, Tax Lot 400 (~10.00 acres). Consolidated Metco, Inc. acquired from Port of Portland on June 30, 1966. Tax Account No. R355202.

Oregon Secretary of State Business Registry No. 007910-20. Registry date: 06-17-1964. Entity Name: Consolidated Metco, Inc.

ConMet operated an aluminum foundry at the Property. Operations at the foundry included melting and holding, casting, machining, heat-treating, and assembly of custom aluminum casting.

See Attachment 1 for reference documents.

6. *Identify any persons who concurrently with you exercises or exercised actual control or who held significant authority to control activities at each Property, including:*

a. *partners or joint venturers;*

Response 6a. None.

b. *any contractor, subcontractor, or licensor that exercised control over any materials handling, storage, or disposal activity on the Property; (service contractors, remediation contractors, management and operator contractors, licensor providing technical support to licensed activities);*

Response 6b. The following contractors and subcontractors have been retained by ConMet:

6b. Contractor, Subcontractor, or Licensor that Exercised Control Over Any Materials Handling, Storage, or Disposal Activity on the Property	
Company	Activity
Kennedy/Jenks Consultants	Paint storage emergency spill tank removal, soil excavation
Crosby and Overton	UST removal, waste removal from Property for disposal
Envirotech or Thermo Fluids, Inc. (formerly Spencer Environmental)	Waste removal from Property for disposal
Bockman and Son	Aluminum recycling
Thermo Fluids, Inc.	Waste removal from Property for disposal
MDC	Waste removal from Property for disposal
EPSI	Waste removal from Property for disposal
Calbag	Aluminum and scrap steel recycling
Imsalco	Aluminum recycling
Fuel Processors Incorporated	Waste removal from Property for disposal
McClary Columbia Corporation	Waste removal from Property for disposal
Safety Kleen Corporation	Waste removal from Property for disposal
Burlington Environmental, Inc.	Waste removal from Property for disposal

- c. *any person subleasing land, equipment or space on the Property;*

Response 6c. Steinfeld's Product Company leased the South Foundry (i.e., the Radiator Building) from approximately 1985 to 1989 for use as a warehouse (see Attachment 1).

- d. *utilities, pipelines, railroads and any other person with activities and/or easements regarding the Property;*

Response 6d. According to a map entitled *ALTA/ACSM Land Title Survey Consolidated Metco Site*, prepared by WRG Design Inc. and dated September 5, 2002, the following easements are associated with the Property:

1. A non-exclusive right-of-way easement for the purposes of construction, maintenance, and operation of a pipeline for conveying water from the Willamette River.
2. An easement for the City of Portland for water main(s) and meter vault at the northwestern corner of Parcel II.
3. An easement for the City of Portland for sewers and water main in the northern portion of Parcel I.
4. An easement for the City of Portland for a meter vault in the western portion of Parcel II.
5. An easement for the Port of Portland for a standard-gauge railroad track along the eastern portions of both parcels.

- e. *major financiers and lenders;*

Response 6e. None.

- f. *any person who exercised actual control over any activities or operations on the Property;*

Response 6f. Organization charts for ConMet from 1988, 1994, 2002, and 2006 summarize the management of activities and operations at the Property for those years. The charts are included as Attachment 1.

- g. *any person who held significant authority to control any activities or operations on the Property;*

Response 6g. Persons who held significant authority to control activities and operations are shown on the organization charts (Attachment 1) from 1988, 1994, 2002, and 2006.

- h. *any person who had a significant presence or who conducted significant activities at the Property; and*

Response 6h. Persons who had a significant presence or conducted significant activities at the property are shown on the organization charts (Attachment 1).

- i. *any government entities that had proprietary (as opposed to regulatory) interest or involvement with regard to the activity on the Property.*

Response 6i. None.

7. *Identify and describe any legal or equitable interest that you now have, or previously had in each Property. Include information regarding the nature of such interest; when, how, and from whom such interest was obtained; and when, how, and to whom such interest was conveyed, if applicable. In addition, submit copies of all instruments evidencing the acquisition or conveyance of such interest (e.g., deeds, leases, purchase and sale agreements, partnership agreements, etc.).*

Response 7. ConMet purchased the two parcels comprising the Property in 1964 and 1966 and has owned the property since its purchase. Copies of the Warranty Deeds for the Property are included in Attachment 1.

8. *If you are the current owner and/or current operator, did you acquire or operate the Property or any portion of the Property after the disposal or placement of hazardous substances, waste, or materials on, or at the Property? Describe all of the facts on which you base the answer to this question.*

Response 8. According to a report prepared by Dames & Moore for the Freightliner Corporation entitled *Foundation Investigation, Proposed Foundry Building, Rivergate Industrial Area, Portland, Oregon*, and dated April 16, 1964, the ConMet facility is built on sediment dredged from the Columbia River (see Attachment 2). Beginning around 1942, dredged material was placed on the Property (i.e., before ConMet's ownership). The hazardous characteristics (if any) of the sediment and other materials were not known. Specifically, the report states the following:

"Information obtained from the Port of Portland indicates that the area was filled by dredging from the Columbia River to approximately elevation 30 feet in about 1942. The upper 15 feet or so of this fill was removed in 1960 for filling at other nearby sites. It was subsequently refilled to the present elevation in 1962 with dredge material from the river. From explorations at nearby sites in the Rivergate area, it is known that soft and compressible river deposited soils underlie the fill to approximately elevation -30 to -40 feet (City of Portland datum)."

In 1960, dredged material was removed to a depth of 15 feet and used to fill other nearby sites. Additional dredged material was placed on the Property in 1962.

It is possible that other material (e.g., sediment dredged from the Willamette River) may have been placed on the property before 1964. ConMet has no information on pre-1964 deposition of dredge spoils.

9. *At the time you acquired or operated the Property, did you know or have reason to know that any hazardous substance, waste, or material was disposed of on, or at the Property? Describe all investigations of the Property you undertook prior to acquiring the Property and all of the facts on which you base the answer to this question.*

Response 9. At the time ConMet acquired the property in 1964, thorough environmental site assessments were not a common element of due diligence in real estate transactions. ConMet was aware that dredged sediment and other materials had been placed on the Property before construction of the facility. However, the hazardous characteristics of the sediment and other materials were not known. Dames & Moore reported that sediment dredged from the Columbia River had been disposed of on the Property before its development in 1964. This appears to have been the only investigation conducted at the property before its development.

10. *Identify all prior owners that you are aware of for each Property identified in Response to Question 4 above. For each prior owner, further identify if known, and provide copies of any documents you may have regarding:*

- a. *the dates of ownership;*
- b. *all evidence showing that they controlled access to the Property; and*
- c. *all evidence that a hazardous substance, pollutant, or contaminant, was released or threatened to be released at the Property during the period that they owned the Property.*

Response 10.

See table on the following page.

It is not known whether the Port of Portland controlled access to the Property before 1964. However, ConMet has maintained a fence with gates around all or a portion of the Property since at least 1968.

10. 13940 North Rivergate Boulevard		
Years of Ownership	Owner	Hazardous Substance, Pollutant, or Contaminant Released
Before 1964	Port of Portland	According to a report by Dames & Moore, the Property was filled with material dredged from the Columbia River before 1964 based on information obtained from the Port of Portland.
1964 to 2008	Metco, Inc. (1964) and Consolidated Metco, Inc. (1966)	Spent machine coolant and spent shell core sand were disposed of near the northern side of the Chip Reclamation Building in 1969 or 1970.
		Spent machine coolant was released to the ground surface outside of the Machine Shop in the mid-1980s
		Spent machine coolant was released from a dumpster containing used absorbent material in the 1990s.
		Releases of spent machine coolant occurred in 2000, 2001, 2003, and 2004.

11. *Identify all prior operators of the Property, including lessors, you are aware of for each Property identified in response to Question 4 above. For each such operator, further identify if known, and provide copies of any documents you may have regarding:*
- a. the dates of operation;*
 - b. the nature of prior operations at the Property;*
 - c. all evidence that they controlled access to the Property; and*
 - d. all evidence that a hazardous substance, pollutant, or contaminant, was released or threatened to be released at or from the Property during the period that they were operating the Property.*

Response 11.

Port of Portland

The Port of Portland owned the Property before 1964. Sediment and other material dredged from the Columbia River were placed on the Property on at least two occasions: circa 1942 and 1962.

ConMet

From 1964 until 2007 (production operations ceased on October 5, 2007), ConMet operated an aluminum, permanent-mold casting foundry and machining facility at the Property, primarily manufacturing heavy-duty truck parts. Operations at the foundry included melting and holding, casting, machining, heat-treating, and assembly of custom aluminum castings. The last type of product produced was aluminum-alloy wheel hub assemblies for tractor-trailers. Other heavy-duty truck components produced included: (1) fuel-water separators, (2) air-brake tanks, (3) mufflers and exhaust elbows, and (4) radiators.

Two driveways currently provide access (from the west) to the Property from North Rivergate Boulevard. Both driveways are gated. In addition, two driveways with gates are located along North Ramsey Boulevard.

Except for the parking lots, the entire facility is surrounded by a chain-link fence. In addition, a security guard is on duty 24 hours a day. According to facility drawings, a chain-link fence had been in place around portions of the Property in 1968 and 1976.

Several spills and releases of materials have occurred during ConMet's operations. Those releases and spills are discussed in detail in Section 6.0.

Steinfeld's Product Company

Steinfeld's Product Company (a food producer located on the adjacent property to the south) leased the South Foundry (i.e., the Radiator Building) from circa 1985 to 1989 for use as a warehouse.

There is no evidence that a hazardous substance, pollutant, or contaminant was released by Steinfeld's Product Company during its lease of the South Foundry.

12. *If not included in response to any of the previous questions, please describe the purpose and duration of each aquatic lands lease Respondent or the operator of Respondent's Property(ies) ever obtained from the State of Oregon and provide a copy of each application for and aquatic lands lease obtained.*

Response 12. Not applicable.

Section 3.0 Description of Each Property

13. *Provide the following information about each Property identified in response to Question 4:*

a. *property boundaries, including a written legal description;*

Response 13a. The boundaries and written legal description of the property are shown on the map entitled *ALTA/ACSM Land Title Survey Consolidated Metco Site*, prepared by WRG Design Inc. and dated September 5, 2002. See Drawings – Attachment 3.

b. *location of underground utilities (telephone, electrical, sewer, water main, etc.);*

Response 13b. The locations of underground utilities are shown on the map entitled *ALTA/ACSM Land Title Survey Consolidated Metco Site*, prepared by WRG Design Inc. and dated September 5, 2002.

c. *location of all underground pipelines whether or not owned, controlled or operated by you;*

Response 13c. The location of underground piping used to transfer water-soluble machine coolant from the Chip Reclamation Building to the Machine Shop is shown on Figure 5 of the report entitled *Spill Prevention Control and Countermeasure Plan, Consolidated Metco Inc.*, prepared by Kennedy/Jenks Consultants, and dated March 2001 (See Attachment 4).

An underground propane pipeline runs from a propane aboveground storage tank (AST), located near the northeastern corner of the property, along the northern property boundary to dispenser pumps located southeast of the Machine Shop and along the eastern and western sides of the North Foundry.

Other than water and sewer lines, ConMet is not aware of any other pipelines on the Property.

d. *surface structures (e.g., buildings, tanks, pipelines, etc.);*

Response 13d. The following surface structures are located on the Property: (1) Main Office Building, (2) North Foundry Building, (3) South Foundry Building (i.e., former Radiator Building), (4) Chip Reclamation Building, (5) Machine Shop, (6) Warehouse, and (7) the propane AST.

Section 5.2.1 of the Spill Prevention Control and Countermeasure (SPCC) Plan dated March 2001 lists tanks located at the Property (see Attachment 4). An excerpt from the SPCC Plan is present below. Cutting fluid refers to water-soluble machine coolant.

One used oil AST and one diesel AST are located at this facility. In addition, several other tanks that hold or store oil and oil mixtures used in the manufacturing process are located at this facility. Oil and oil mixtures are also stored in 55-gallon drums and within various manufacturing units (equipment). A list of ASTs and other containers of oil and oil mixtures are provided below.

Tank ID	Total Volume (Gallons)	Contents
Evaporator shed used oil AST	300	Used machine oil
Diesel fuel AST	480	Diesel Fuel
Evaporator	55	Wastewater
Evaporator holding tank	1,000	Wastewater
Cutting fluid transfer tank	400	Dilute cutting fluid
Cutting fluid transfer tank	500	Dilute cutting fluid
Cutting fluid storage/transfer tank	500	Dilute cutting fluid
Cutting fluid delivery tote	810	Cutting fluid concentrate
Reclaimed cutting fluid process tank	300	Dilute cutting fluid
Reclaimed cutting fluid process tank	1,500	Dilute cutting fluid
Reclaimed cutting fluid process tank	450	Dilute cutting fluid
Six electrical transformers	1,800	Mineral oil
Manufacturing and processing units	850	Hydraulic oil
Manufacturing and processing units	2,500	Dilute cutting fluid

e. *over-water structures (e.g., piers, docks, cranes, etc.);*

Response 13e. ConMet has never had any over-water structures.

f. *dry wells;*

Response 13f. ConMet has never operated any dry wells.

g. *treatment or control devices (e.g., surface water, air, groundwater, Resource Conservation and Recovery Act (RCRA), Transfer, Storage, or Disposal (TSD), etc.);*

Response 13g.

Wastewater Treatment

The facility operated two wastewater treatment processes:

1. An evaporator system was used for spent machine coolant from circa 1985 to 2007. Sludge removed from the system was disposed of as a solid waste. The system is located in a covered shed on the northern side of the South Foundry.

2. An in-ground concrete vault was used to treat wastewater generated during the cleaning and flushing of radiators prior to their restoration in the Radiator Building (i.e., South Foundry). The treatment consisted of the precipitation of metals from the wastewater. This wastewater treatment system was located north of the Radiator Building and operated from approximately 1968 to 1983 (radiator manufacturing ceased in October 1983). Sludge contained in the vault was removed and disposed of as a hazardous waste (due to lead content) at licensed facilities. From Circa 1964 to 1969, the wastewater treatment system discharged to a septic tank and leachfield. After circa 1969 and connection to the POTW, the wastewater was discharged to the municipal sewer. The vault was removed in February 1987.

Underground Storage Tank

A 400-gallon underground storage tank (UST) was located in the grass-covered area south of the South Foundry. The tank was part of a spill containment system for a paint storage room located in the building. A floor drain in the room was connected to the tank via underground piping. The tank was removed in 2004. Because the purpose of the UST was containment of spills, the UST was exempt from registration.

Baghouses for Air Emissions

In 1986 and 1989, the emission control systems included (1) baghouses on the bead blaster and sand blaster and (2) an afterburner on the chip reclamation furnace. The baghouses on the bead blaster and sand blaster were the only emission control systems at the Property in 1994.

Permits

The facility maintained the following: air quality (baghouses) permit, National Pollutant Discharge Elimination System (NPDES) permit, Industrial Wastewater Discharge (municipal sanitary sewer) permit.

- h. groundwater wells, including drilling logs;*

Response 13h.

Water Supply Well

A groundwater supply well was located outside of the northwestern corner of the North Foundry. The well was 6 inches in diameter and approximately 209 feet deep. The well provided potable water from 1964 until circa 1969, when the Property was connected to the City of Portland's potable water distribution system. In December 2003, the well was abandoned by perforation of the steel casing and filling it with cement grout. The Oregon Water Resource Department Start Card and Water Supply Well Report for the abandonment are attached to a letter to Mr. Nimister from Chris Hyatt of Kennedy/Jenks Consultants dated April 15, 2004 (see Attachment 5).

February 2001 Subsurface Investigation

Groundwater samples were collected from 5 borings drilled as part of a February 2001 investigation. The logs for these 5 borings (along with the logs from four other borings) are included in the report entitled *Environmental Sampling Report*, prepared by Kennedy/Jenks and dated May 10, 2001 (see Attachment 6).

- i. *storm water drainage system, and sanitary sewer system, past and present, including septic tank(s) and where, when and how such systems are emptied and maintained;*

Response 13i. ConMet has separate storm water drainage and sanitary sewer systems. The sanitary sewer system has changed over time. From 1964 to circa 1969, the sanitary sewer discharged into a septic system. The septic system consisted of a septic tank located south of the Office Building and a leach field located along the western boundary of the property.

The Property's sanitary sewer was connected to the City of Portland's Publicly Owned Treatment Works (POTW) circa 1969. Anecdotal information indicates the septic tank was removed in the 1970s during other improvements to the property. The design of the septic system is shown on drawing "Sanitary Sewer System, dated 5-9-66, drawing No. P1295-1," and is presented as Attachment 3. The locations of the septic tank and leachfield are shown in a figure attached to letter from ConMet to Bureau of Sanitary Engineering dated January 4, 1982 (Attachment 16, Subfolder A).

ConMet used a storm water sewer system from the initial development of the site. Currently, storm water collected onsite by storm sewer catch basins is conveyed to a storm sewer beneath North Rivergate Boulevard. This drainage line discharges to another storm sewer beneath North Ramsey Boulevard. This sewer, in turn, discharges to the Willamette River at Outfall 53A. However, the nature of the storm sewer system appears to have changed over time.

According to a Report of Plumbing Inspection prepared by Multnomah County Division of Public Health in July 1964, roof drains from the North Foundry discharged to a tile field. The report had no other information about the storm water system.

A second Report of Plumbing Inspection prepared by Multnomah County Division of Public Health in November 1965 indicates that some storm water runoff from the Property was discharged to a ditch located along North Rivergate Boulevard. The second report had no other information about the storm water system.

According to a site plan prepared by Moffatt, Nichol & Bonney, Inc. in 1968, a more extensive storm sewer with catch basins existed at the Property. The plan indicates that storm sewer discharged to a line beneath North Rivergate Boulevard.

- j. *subsurface disposal field(s), Underground Injection Control (UIC) wells, and other underground structures (e.g., underground storage tanks (USTs); and where they are located, if they are still used, and how they were closed;*

Response 13j. ConMet operated two underground storage tanks (USTs) and a sanitary septic system (see part (i) of Question 13 for a discussion of the septic system).

Spill Containment UST. A 400-gallon UST was located in the grass-covered area south of the South Foundry. The tank was part of a spill containment system for a paint storage room located in the building. A floor drain in the paint storage room was connected to the tank via underground piping. The floor drain was filled with cement in 1995 when ConMet discontinued use of the paint storage room and spill containment system (i.e., UST).

In March 2004, the 400-gallon UST was removed from the ground and disposed of as scrap metal at Schnitzer Steel in Portland. The removal of the tank is discussed in a letter report prepared by Kennedy/Jenks Consultants on April 28, 2004 (see Attachment 7). According to Kennedy/Jenks Consultants, the tank's exterior wall had no visible evidence of corrosion holes.

Two soil samples were collected from the excavation at locations corresponding to the bottom of the UST and analyzed for volatile organic compounds (VOCs) and metals using the Toxicity Characteristic Leaching Procedure (TCLP). VOCs were not detected. Metals were not detected above TCLP limits. Kennedy/Jenks Consultants concluded that soil quality had not been impacted.

Wastewater Concrete Vault. An approximate 4,000-gallon in-ground concrete vault was located north of the South Foundry. The vault was part of the wastewater treatment system for the Radiator Plant that was located in the building from 1968 to 1983. The vault was removed from the ground on January 24, 1986, by Crosby and Overton. Five soil samples were collected following the excavation and analyzed for copper, lead, and zinc. According to Crosby and Overton, the concentration of these metals detected in the soil samples was within background range. Information about the removal of the vault is included as Attachment 7.

- k. *any and all major additions, demolitions or changes on, under or about the Property, its physical structures or to the property itself (e.g., stormwater drainage, excavation work); and any planned additions, demolitions or other changes to the Property;*

Response 13k.

1. North Foundry (i.e., Casting Plant). The original, central portion of the building was constructed in two phases in 1964. The southern addition to the building was constructed from 1968 to 1969, and the northern addition was constructed in 1976.

2. The western portion of the original Radiator Plant (i.e., South Foundry or Gusset Building) was constructed in 1968. An addition was constructed to the eastern side of the building in approximately 1969 and a large addition was constructed to the southern side of the building in 1973.
3. The western half of the Machine Shop was constructed in 1971. An addition to the eastern side of the building was completed in 1976 or 1977.
4. The Chip Reclamation Building was constructed in 1970.
5. The Warehouse was constructed in 1976.
6. The Office Building was constructed in 1966, with the second floor added in 1969.
7. Manufactured buildings used as a cafeteria were located between the Machine Shop and the Chip Reclamation Building from approximately 1969 to 1985. The manufactured buildings were located on concrete footings, which are still present on the property.

Asphalt-paved parking areas on the northern and western portions of the property were installed between 1964 and 1973. Both the storm water and sanitary sewer systems were expanded as ConMet constructed additional buildings and parking lots.

- l. all maps and drawings of the Property in your possession; and*

Response 13l. Maps and drawings are included as Attachment 3.

- m. all aerial photographs of the Property in your possession.*

Response 13m. Aerial photographs are included as Attachment 8.

14. *For Properties adjacent to the Willamette River, provide specific information describing the river-ward boundary of private ownership and where state aquatic lands and/or state-management jurisdiction begins. Provide a map that delineates the river-ward boundary of each Property.*

Response 14. Not applicable.

15. *For each Property, provide all reports, information or data you have related to soil, water (ground and surface), or air quality and geology/hydrogeology at and about each Property. Provide copies of all documents containing such data and information, including both past and current aerial photographs as well as documents containing analysis or interpretation of such data.*

Response 15. Reports, information, and data related to soil, water, and air quality and geology/hydrogeology are included in the following attachments:

- Attachment 2 Foundation Investigation, Proposed Foundry Building, Rivergate Industrial Area, Portland, Oregon for Freightliner Corporation, prepared by Dames & Moore and dated April 16, 1964.
- Attachment 5 April 15, 2004 letter to Mr. Nimister from Mr. Chris Hyatt of Kennedy/Jenks Consultants discussing the closure of the water supply well.
- Attachment 6 Environmental Sampling Report, prepared by Kennedy/Jenks Consultants and dated May 10, 2001.
- Attachment 7 Crosby and Overton's summary of the removal of the concrete vault prepared in 1986.
- April 28, 2004 letter to Mr. Nimister and Ms. Claudia Powers from Kennedy Jenks Consultants discussing the closure of the 400-gallon UST south of the South Foundry, associated with the former Paint Storage Room (see file entitled "UST Decommission.pdf")..
- Attachment 8 Aerial Photographs.
- Attachment 9 Stormwater Discharge Permits and Monitoring Reports.
- Attachment 10 2000, 2001, and 2003 Spill Reports, 2004 Internal Memo

16. *Identify all past and present solid waste management units or areas where materials are or were in the past managed, treated, or disposed (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc.) on each Property. For each such unit or area, provide the following information:*

- a. *a map showing the unit/area's boundaries and the location of all known units/areas whether currently in operation or not. This map should be drawn to scale, if possible, and clearly indicate the location and size of all past and present units/areas;*
- b. *dated aerial photograph of the site showing each unit/area;*
- c. *the type of unit/area (e.g., storage area, landfill, waste pile, etc.), and the dimensions of the unit/area;*

- d. *the date that the unit/area was in use;*
- e. *the purpose and past usage (e.g., storage, spill containment, etc.);*
- f. *the quantity and types of materials (hazardous substances and any other chemicals) located in each unit/area; and*
- g. *the construction (materials, composition), volume, size, dates of cleaning, and condition of each unit/area.*

Response 16. Areas where wastes are or were managed, treated, or disposed are shown on the figure in Attachment 3. An aerial photograph of the site showing these areas is also included in Attachment 3.

Solid waste management units were comprised of drop boxes, storage drums, or tote boxes. The waste stream and accumulation containers are presented in the following table adapted from a table prepared by ConMet in 2006 (see Attachment 11). Container storage was either inside the buildings or along the exterior of the buildings. There were no waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits on the property. Spent core sand was stored in specified drop boxes typically located on the northern and eastern sides of the North Foundry. The drop boxes were transported offsite for disposal or recycling of the contents.

Northern Side of Chip Reclamation Building. Along the northern side of the Chip Reclamation Building, several cubic yards of spent shell core sand and quench water containing diluted water-soluble machine coolant were disposed of in late 1969 and/or early 1970. The majority of this area (greater than ~75%) is currently paved with asphalt or covered by the Chip Reclamation Building.

USTs and Septic System. ConMet operated two underground storage tanks (USTs) and a sanitary septic system (see parts (i) and (j) of Question 13 for a discussion of the USTs and septic system).

16. Waste Storage Areas											
Area	Location	Type of Waste	Source	Waste Code or Type	Approximate Dimensions of Unit/Area	Date of Use	Past Use of Area	Quantity of Material	Construction and Volume or Size	Date of Cleaning and Condition	Closure
1a	Chip Reclamation Building	Absorbent, oil-contained	Plant operations	Non-hazardous	4 x 4 ft	Late 1980s to current		Lined 1-cubic-yard box	Concrete floor	Periodic routine housecleaning, concrete floor in good condition	No longer in use.
1b	South Foundry, canopy on western loading dock	Absorbent, oil-contained	Plant operations	Non-hazardous	3 x 3 ft	Late 1980s to current	Evaporator	Lined 1-cubic-yard box	Concrete floor	Periodic routine housecleaning, concrete floor in good condition	
1c	Inside northwestern corner of South Foundry	Absorbent, oil-contained	Plant operations	Non-hazardous	6 x 9 ft	Late 1980s to current	Evaporator	Lined cubic yard box	Concrete floor	Periodic routine housecleaning, concrete floor in good condition	
2a	Canopy north of North Foundry	Aluminum chips/borings	Machine Shop and foundry	Non-hazardous	12 x 24 ft	Mid-1980s to 2007	Molten aluminum delivery	2 x 20-cubic yard hoppers	Asphalt-concrete floor, 2 x 20 cubic yards	Periodic housecleaning, asphalt and concrete in good condition.	No longer in use.
2b	Chip Reclamation Building	Aluminum chips/borings	Machine Shop and foundry	Non-hazardous	40 x 40 ft	1978-2007		20 cubic yards	2-cubic yard hopper on concrete floor	Periodic housecleaning, concrete floor in good condition.	No longer in use.
2c	Inside North Foundry	Aluminum chips/borings	Machine Shop and foundry	Non-hazardous	4 x 4 ft	1965-2007		2 cubic yards	2-cubic-yard hopper on concrete floor	Periodic housecleaning, concrete floor in good condition.	No longer in use.

16. Waste Storage Areas

Area	Location	Type of Waste	Source	Waste Code or Type	Approximate Dimensions of Unit/Area	Date of Use	Past Use of Area	Quantity of Material	Construction and Volume or Size	Date of Cleaning and Condition	Closure
3a	South warehouse canopy	Aluminum dross	Foundry	DOT hazardous material	Under canopy, 5 x 4ft	1978-2007		2 x 2-cubic-yards boxes	2 x 2-cubic-yards boxes on concrete pavement	Periodic housecleaning, concrete pavement in good condition.	No longer in use.
3b	Loading dock	Aluminum dross	Foundry	DOT hazardous material	40-ft-long tractor trailer	1985-2007		30,000 lbs in 40-foot-long tractor trailer	40-foot-long tractor trailer on concrete pavement	Periodic housecleaning, concrete pavement in good condition.	No longer in use.
3a	South warehouse canopy	Aluminum, scrap contaminated	Foundry	Non-hazardous	Under canopy, 5 x 4ft	1976-2007		2 x 2-cubic-yards boxes	2 x 2-cubic-yards boxes on concrete pavement	Periodic housecleaning, concrete pavement in good condition.	No longer in use.
3b	Loading dock	Aluminum, scrap contaminated	Foundry	Non-hazardous	40-ft-long tractor trailer	1985-2007		4,500 lbs in 40-ft tractor trailer	40-foot-long tractor trailer on concrete pavement	Periodic housecleaning, concrete pavement in good condition.	No longer in use.
1c	Inside northwestern corner of South Foundry	Antifreeze	Servicing of fork lifts	Non-hazardous	6 x 9 ft	1968-2007		1 x 55-gal drum	Concrete floor, 1 x 55-gal drum	Periodic housecleaning, concrete floor in good condition.	
4a	Outside southwestern corner of Chip Reclamation Building	Baghouse waste, bead-blast	Glass bead baghouse	Non-hazardous	20 x 8 ft	1970-2007		1 x 10-cubic-yard drop box	1 x 10-cubic-yard drop box on asphalt pavement	Periodic housecleaning, pavement in good condition.	No longer in use.

16. Waste Storage Areas

Area	Location	Type of Waste	Source	Waste Code or Type	Approximate Dimensions of Unit/Area	Date of Use	Past Use of Area	Quantity of Material	Construction and Volume or Size	Date of Cleaning and Condition	Closure
4a	Outside southwestern corner of Chip Reclamation Building	Baghouse waste, Chip Reclamation (sand blast, 1970-1987; Nutralite 1988-2007)	Chip reclamation system	Non-hazardous	20 x 8 ft	1970-2007		1 x 10-cubic-yard drop box	1 x 10-cubic-yard drop box on asphalt pavement	Periodic housecleaning, pavement in good condition.	No longer in use.
4a	Outside southwestern corner of Chip Reclamation Building	Baghouse waste, shot-peen	Shot-peen baghouse	Non-hazardous	20 x 8 ft	2000-2007		1 x 10-cubic-yard drop box	1 x 10-cubic-yard drop box on asphalt pavement	Periodic housecleaning, pavement in good condition.	No longer in use.
1c	Inside northwestern corner of South Foundry	Batteries, light bulbs, switches, etc. (spent universal wastes)	Plant and Office	Universal waste	9 x 3 ft	1999-2008		5-gallon bucket, light bulbs in boxes	5-gallon bucket, light bulbs in boxes	Periodic housecleaning, concrete floor in good condition.	
1d	Inside South Foundry	Batteries, light bulbs, switches, etc. (spent universal wastes)	Plant and Office	Universal waste	9 x 3 ft	1999-2008		5-gallon bucket, light bulbs in boxes	5-gallon bucket, light bulbs in boxes	Periodic housecleaning, concrete floor in good condition.	
5a	Southwest of Warehouse	Cardboard, packaging	Plant operations	Non-hazardous	20 x 8 ft	1995-2002		20-cubic-yard drop box	20-cubic-yard drop box on asphalt pavement	Periodic housecleaning, pavement in good condition.	No longer in use.
5b	Northwest of Warehouse	Cardboard, packaging	Plant operations	Non-hazardous	20 x 8 ft	2002-2007		20-cubic-yard drop box	20-cubic-yard drop box on asphalt pavement	Periodic housecleaning, pavement in good condition.	

16. Waste Storage Areas

Area	Location	Type of Waste	Source	Waste Code or Type	Approximate Dimensions of Unit/Area	Date of Use	Past Use of Area	Quantity of Material	Construction and Volume or Size	Date of Cleaning and Condition	Closure
5c	Inside Warehouse	Cardboard, packaging	Plant operations	Non-hazardous	20 x 8 ft	1985-1995		20-cubic-yard drop box	20-cubic-yard drop box on asphalt pavement	Periodic housecleaning, pavement in good condition.	No longer in use.
6a	Compressor room inside North Foundry	Compressor blowdown	Air compressors	Non-hazardous	4 x 3 ft	1976-2007		250-gallon AST	250-gallon AST on concrete floor	Intact tank inside room with containment sump.	No longer in use.
6b	Compressor room inside South Foundry	Compressor blowdown	Air compressors	Non-hazardous	4 x 3 ft	Before 1992, discharged to sanitary sewer. 1992-2007 stored for treatment.		250-gallon AST	250-gallon AST on concrete floor	Intact tank inside room that serves as secondary containment.	No longer in use.
1a and 7a	Inside Chip Reclamation Building	Coolant, machining spent	Machine shop Foundry	Non-hazardous	Varied by drums	1973 to 1985		55-gallon drums	Concrete floor	Periodic housecleaning, pavement in good condition.	No longer in use.
1c	South Foundry	Coolant, machining spent	Machine shop Foundry	Non-hazardous	1,000-gal evaporator tank—moved to Area 6b. After 1987 stored drums	1985 to 1987		55-gallon drums	Concrete floor	Periodic housecleaning, pavement in good condition.	
6b	South Foundry	Coolant, machining spent	Machine shop Foundry	Non-hazardous	1,000-gal evaporator tank	1987 to 2007		55-gallon drums	Concrete floor	Periodic housecleaning, pavement in good condition.	

16. Waste Storage Areas

Area	Location	Type of Waste	Source	Waste Code or Type	Approximate Dimensions of Unit/Area	Date of Use	Past Use of Area	Quantity of Material	Construction and Volume or Size	Date of Cleaning and Condition	Closure
7b	South Foundry	Coolant, machining spent	Machine shop Foundry	Non-hazardous	Varied by drums	1985 to 2007		55-gallon drums	Concrete floor	Periodic housecleaning, pavement in good condition.	
5a	Outside warehouse	Core sand, Air-set (binder air-dried) and shell core (heat-treated with resin)	Foundry	Non-hazardous	8 x 20 ft	Up to mid-1990s moved to Area 2a		40-cubic yard box with general trash	Asphalt pavement	Periodic housecleaning, pavement in good condition.	No longer in use.
2a	Under canopy north of North Foundry	Core sand, Air-set (binder air-dried) and shell core (heat-treated with resin)	Foundry	Non-hazardous	8 x 20 ft	Early to mid-1980s to 2007		20-cubic-yard box	Asphalt-concrete pavement	Periodic housecleaning, pavement in good condition.	No longer in use.
4a	Outside Chip Reclamation Building	Core sand, Air-set (binder air-dried) and shell core (heat-treated with resin)	Foundry	Non-hazardous	8 x 20 ft	Mid 1990s to 2007		20-cubic-yard box	Asphalt pavement	Periodic housecleaning, pavement in good condition.	No longer in use.
1c	Inside northwestern corner of South Foundry	Glycol, water. Hydra-slick then FR200 (hydraulic fluid)	Foundry	Non-hazardous		1983 to 2007		100 gal	55-gallon drums	Periodic housecleaning, pavement in good condition.	
7b	South Foundry	Glycol, water. Hydra-slick (hydraulic fluid)	Foundry	Non-hazardous		1983 to 2007		100 gal	55-gallon drums	Periodic housecleaning, pavement in good condition.	

16. Waste Storage Areas											
Area	Location	Type of Waste	Source	Waste Code or Type	Approximate Dimensions of Unit/Area	Date of Use	Past Use of Area	Quantity of Material	Construction and Volume or Size	Date of Cleaning and Condition	Closure
6b	South Foundry	Glycol, water. Hydra-slick (hydraulic fluid)	Foundry	Non-hazardous		1983 to 2007		100 gal	55-gallon drums	Periodic housecleaning, pavement in good condition.	
1a	Chip Reclamation Building	Glycol, water. Hydra-slick (hydraulic fluid)	Foundry	Non-hazardous		1973 to 1983		100 gal	55-gallon drums	Periodic housecleaning, pavement in good condition.	No longer in use.
1a	Chip Reclamation Building	Drums, 55-gallon steel	Plant operations	Non-hazardous	16 drums	1973 to 2007		55-gallon drums	55-gallon drums	Periodic housecleaning, pavement in good condition.	No longer in use.
1c	Inside northwestern corner of South Foundry	Drums, 55-gallon steel	Plant operations	Non-hazardous	16 drums	Up to 2007		55-gallon drums	55-gallon drums	Periodic housecleaning, pavement in good condition.	
8a	Northern side of South Foundry	Drums, 55-gallon steel	Plant operations	Non-hazardous	16 drums	Up to 2007		55-gallon drums	55-gallon drums	Periodic housecleaning, pavement in good condition.	No longer in use.
1a	Chip Reclamation Building	Waste oil, coolant, and water mixture	Secondary containment	Non-hazardous		Original storage area, starting 1973 to late 1980s		55-gallon drums			No longer in use.

16. Waste Storage Areas

Area	Location	Type of Waste	Source	Waste Code or Type	Approximate Dimensions of Unit/Area	Date of Use	Past Use of Area	Quantity of Material	Construction and Volume or Size	Date of Cleaning and Condition	Closure
1c	Inside northwestern corner of South Foundry	Waste oil, coolant, and water mixture	Secondary containment	Non-hazardous		Late 1980s to current		55-gallon drums			
7b	South Foundry	Waste oil, coolant, and water mixture	Secondary containment	Non-hazardous		Late 1980s to current		55-gallon drums			
1a	Chip Reclamation Building	Oil, used (machine)	Plant operations	Non-hazardous	4 x 4 ft	Original storage area, starting 1973 to late 1980s		55-gallon drum	Concrete floor	Periodic routine housecleaning, pavement in good condition	No longer in use.
1c	Inside northwestern corner of South Foundry	Oil, used (machine)	Plant operations	Non-hazardous	6 x 9 ft	Late 1980s to current		55-gallon drum	Concrete floor	Periodic routine housecleaning, pavement in good condition	
1b	Evaporator building 300-gallon AST	Oil, used (machine)	Plant operations	Non-hazardous	3 x 3 ft	Late 1980s to current		55-gallon drum	Concrete floor	Periodic routine housecleaning, pavement in good condition	
7d	Outside laboratory	Oil, used (machine)	Plant operations	Non-hazardous	3 x 3 ft	Late 1980s to current		55-gallon drum	Concrete floor	Periodic routine housecleaning, pavement in good condition	

16. Waste Storage Areas											
Area	Location	Type of Waste	Source	Waste Code or Type	Approximate Dimensions of Unit/Area	Date of Use	Past Use of Area	Quantity of Material	Construction and Volume or Size	Date of Cleaning and Condition	Closure
5a	North exterior	Furnace refractory	Furnace rebuild and maintenance	Non-hazardous	8 x 20 ft	1995-2002, Unknown before 1995.		Drop box	Asphalt pavement	Periodic routine housecleaning, pavement in good condition	No longer in use.
4a	Outside Chip Reclamation Building	Furnace refractory	Furnace rebuild and maintenance	Non-hazardous	8 x 20 ft	2000-2007		Drop box	Asphalt pavement	Periodic routine housecleaning, pavement in good condition	No longer in use.
Historic Waste											
H1	Northern side of Chip Reclamation Building	Spent shell core sand and quench water containing diluted water-soluble machine coolant	Foundry	Non-hazardous	~10 x 10 ft	1969, one event		4 cubic yards	Unpaved area		No longer in use.
H2	Flammable storage room in Radiator Building	Paint-related material (paint solids, thinners)	Painting process	Most likely hazardous	12 x 12 ft	Up to early 1980s		Unknown	Concrete floor	Unknown	No longer in use. Room removed. Spill containment UST removed.
	Not known	Wastewater treatment sludge	Wastewater treatment from radiator manufacturing	Hazardous	Unknown	Up to early 1980s					No longer in use

16. Waste Storage Areas											
Area	Location	Type of Waste	Source	Waste Code or Type	Approximate Dimensions of Unit/Area	Date of Use	Past Use of Area	Quantity of Material	Construction and Volume or Size	Date of Cleaning and Condition	Closure
	Not known	Pretreated wastewater	Wastewater treatment from radiator manufacturing	Hazardous	Unknown	Up to early 1980s					No longer in use
	Not known	Waste flux solution	Treatment of radiator core and header	Hazardous	Unknown	Up to early 1980s					No longer in use
	Not known	Waste brass cleaner (NuVat)	Cleaning of drawing oil from brass parts	Hazardous	Unknown	Up to early 1980s					No longer in use
	Not known	Spent solvent with drawing oil	Cleaning of drawing oil from diesel fuel filters	Hazardous	Unknown	Up to early 1980s					No longer in use

17. *If the unit/area described above is no longer in use, how was such unit/area closed and what actions were taken to prevent or address potential or actual releases of waste constituents from the unit/area.*

Response 17. ConMet operated two underground storage tanks (USTs) and a sanitary septic system (see parts (i) and (j) of Question 13 for a discussion of the USTs and septic system).

For other areas, see the table in the answer to Question 16.

18. *For each Property, provide the following information regarding any current or former sewer or storm sewer lines or combined sanitary/storm sewer lines, drains, ditches, or tributaries discharging into the Willamette River:*

- a. *the location and nature of each sewer line, drain, ditch, or tributary;*
- b. *the date of construction of each sewer line, drain, ditch, or tributary;*
- c. *whether each sewer line, or drain was ever connected to a main trunk line;*
- d. *whether each sewer line, drain, ditch, or tributary drained any hazardous substance, waste, material or other process residue to the Willamette River; and*
- e. *provide any documentation regarding but not limited to the following on any and all outfalls to the Willamette River which are located within the boundaries of the Property(ies). Your response should include, but not be limited to:*
 - i. *the areas serviced by the outfalls; and*
 - ii. *the type of outfall (i.e., storm water or single facility operational).*

Response 18. The locations of sewer lines are shown on the map entitled *ALTA/ACSM Land Title Survey Consolidated Metco Site*, prepared by WRG Design Inc. and dated September 5, 2002 (see Drawings - Attachment 3).

ConMet has separate storm water drainage and sanitary sewer systems. The nature of the sanitary sewer system has changed over time. From 1964 to circa 1969, the sanitary sewer discharged into a septic system. The septic system consisted of a septic tank located south of the Office Building and a leach field located along the western boundary of the property. The Property was connected to the City of Portland's Public Owned Treatment Works (POTW) circa 1969. Anecdotal information indicates the septic tank was removed in the 1970s during other improvements to the property.

ConMet has used a storm water sewer system from the initial development of the site. Currently, storm water collected onsite by storm sewer catch basins is conveyed to a storm sewer beneath North Rivergate Boulevard. This sewer discharges to another storm sewer beneath North Ramsey Boulevard. This sewer discharges to the Willamette River

at Outfall 53A. However, the nature of the storm sewer system appears to have changed over time.

According to a Report of Plumbing Inspection prepared by Multnomah County Division of Public Health in July 1964, roof drains from the North Foundry discharged to a tile field. The report had no other information about the storm water system.

A second Report of Plumbing Inspection prepared by Multnomah County Division of Public Health in November 1965 indicates that some storm water runoff from the Property was discharged to a ditch located along North Rivergate Boulevard. The second report had no other information about the storm water system.

According to a site plan prepared by Moffatt, Nichol & Bonney, Inc. in 1968, a more extensive storm sewer with catch basins existed at the Property. The plan indicates that storm sewer discharged to a line beneath North Rivergate Boulevard.

A release of spent water-soluble machine coolant occurred in February 2001. The coolant was observed on the surface of the Willamette River (emanating from Outfall 53A) and traced to a catch basin on the Property. Investigations conducted by ConMet evaluated that the release was the result of leak from an underground pipeline used to transport coolant from the Chip Reclamation Building to the Machine Shop. The leak was promptly repaired.

Another release of spent water-soluble machine coolant (or coolant) occurred in August 2003 after the City of Portland Fire Department helped cool a "hot spot" in the chip melting system located in the Chip Reclamation Building. The release occurred after water used to cool the hot spot filled the system's containment tank and caused the tank to overflow onto the floor of the building and outside into a storm sewer catch basin. The coolant was observed on the Willamette River (emanating from Outfall 53A). ConMet personnel estimated that approximately 15 gallons of the mixture flowed to the river.

There are no direct outfalls to the Willamette River on the Property; stormwater from the Property discharges via the municipal storm sewer that discharges via Outfall 53A to the Willamette River.

19. *Provide copies of any stormwater or property drainage studies, including data from sampling, conducted at these Properties on stormwater, sheet flow, or surface water runoff. Also provide copies of any Stormwater Pollution Prevention, Maintenance Plans, or Spill Plans developed for different operations during the Respondent's operation of each Property.*

Response 19. In cooperation with the Oregon Department of Environmental Quality (DEQ), ConMet has recently completed an investigation into stormwater and sediment quality at the Property. Sediment samples were collected from three catch basins located on the Property in March 2007. Stormwater samples were collected from three locations on the Property in June, October, and November 2007 and January 2008. Reports presenting the results of the sampling are included as Attachment 9B.

In addition, ConMet maintains a Storm Water Pollution Control (SWPC) plan and a Spill Prevention Control and Countermeasure (SPCC) plan for the Property. The SWPC plan requires that four samples of stormwater be collected and analyzed for parameters specified in the plan during each annual monitoring period. The plans are included as Attachment 9D.

The facility has maintained a stormwater permit since at least 1992 (See Attachment 9C). Routine inspection records, sample analysis results, and annual reports are also presented in Attachment 9A.

Section 4.0 Respondent's Operational Activities

20. *Describe the nature of your operations or business activities at each Property. If the operation or business activity changed over time, please identify each separate operation or activity, the dates when each operation or activity was started and, if applicable, ceased.*

Response 20. From 1964 until 2007 (production operations ceased on October 5, 2007), ConMet operated an aluminum permanent-mold casting foundry and machining operation primarily manufacturing parts for the heavy-duty truck market. Operations at the foundry included melt and hold, casting, machining, heat-treating, and assembly of custom aluminum casting. The last type of product produced was aluminum alloy wheel hub assemblies for tractors and trailers. Other products included heavy-duty truck components: (1) fuel-water separator, (2) air-brake tanks, (3) mufflers and exhaust elbows, and (4) radiators.

21. *At each Property, did you ever use, purchase, generate, store, treat, dispose, or otherwise handle any waste, or material? If the answer to the preceding question is anything but an unqualified "no," identify:*

- a. in general terms, the nature and quantity of the waste or material so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled;*
- b. the chemical composition, characteristics, physical state (e.g., solid, liquid) of each waste or material so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled;*
- c. how each such waste or material was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you; and*
- d. the quantity of each such waste or material used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you.*

Response 21.

Wastes

The waste streams and disposal locations for the facility are presented in the table below.

21.1 Wastes

Waste Stream	Source	Accumulation Container	Waste Code or Type	Waste Transporter	TSD Facility and/or Recycling Location and How Managed	Chemical Composition	Physical State, Color, and Odor	Rate of Generation
Absorbent, oil-contained	Plant operations	Lined cubic yard box	Non-hazardous	Envirotech or Thermo Fluids, Inc. (formerly Spencer Environmental)	Spokane Regional - Energy Recovery	Various oils	Solid and liquid	2 cubic yards/month
Aluminum chips/borings	Machine Shop and foundry	Self-dumping hoppers	Non-hazardous	Not applicable	Recycled at facility	Aluminum	Solid	Tons Recycled 1,200 (2000) 700 (2001) 714 (2002) 764 (2003) 1,117 (2004)
Aluminum dross	Foundry	Self-dumping hoppers	DOT hazardous material	Bockman and Son (1968-1985), Tolling hauler (1985-).	IMCO - Postfalls, Idaho Recycled/Reclaimed	Aluminum	Solid	54,000 lbs/month
Aluminum, scrap, contaminated	Foundry	Tote boxes	Non-hazardous	Bockman and Son (1968-1985), Tolling hauler (1985-).	IMCO - Postfalls, Idaho Recycled/Reclaimed	Aluminum	Solid	6,000 lb/month
Antifreeze	Servicing of equipment	55-gallon drums	Non-hazardous	Thermo Fluids, Inc.	Antifreeze Recycling	Glycol	Liquid	1 x55-gal drum per year
Baghouse waste, bead-blast	Glass bead baghouse	55-gallon drums, then 10-cubic-yard box	Non-hazardous	MDC	Originally, St. Johns Landfill up to circa 1991. Hillsboro Landfill Special Permit #3132	Glass beads, mica	Solid	1 cubic yard/month
Baghouse waste, Chip Reclamation	Chip reclamation system	10-cubic-yard box	Non-hazardous	MDC	Originally, St. Johns Landfill up to circa 1991. Hillsboro Landfill Special Permit #3132	Nutralite filter media (silicate) with fire retardant	Solid	2 cubic yards/month
Baghouse waste, shot-peen	Shot-peen baghouse	10-cubic-yard box	Non-hazardous	MDC	Hillsboro Landfill Special Permit #3132	Steel	Solid	1 cubic yard/month

21.1 Wastes

Waste Stream	Source	Accumulation Container	Waste Code or Type	Waste Transporter	TSD Facility and/or Recycling Location and How Managed	Chemical Composition	Physical State, Color, and Odor	Rate of Generation
Batteries, light bulbs, switches, etc. (spent universal wastes)	Plant and Office	5-gallon bucket, light bulbs in boxes	Universal waste	EPSI	Recycled at EPSI	--	Solid	5-gallon bucket/year. Six boxes of light bulbs/year
Cardboard, packaging	Plant operations	20-cubic-yard drop box	Non-hazardous	MDC	Recycled			1 x 20-cubic-yard drop box/month
Compressor blowdown	Air compressors	250-gallon tank	Non-hazardous	Thermo Fluids, Inc.	Onsite evaporation or Thermo Fluids, Inc.	Compressor oil and water	Liquid	250gallons/3 months
Coolant, machining spent	Machine shop, Foundry	55-gallon drums	Non-hazardous	Thermo Fluids, Inc.		Petroleum oil in water	Liquid, white, oil-like odor	~100 gal/week
Coolant, machining spent	Machine shop, Foundry	55-gallon drums	Non-hazardous	Thermo Fluids, Inc.	Onsite evaporation or Thermo Fluids, Inc.	Petroleum oil in water	Liquid, white, oil-like odor	500 gal/week total for Areas 1c, 6b, and 7b. Shipped offsite only as needed, otherwise evaporated onsite
Outside warehouse	Core sand, Air-set (binder air-dried) and shell core (heat-treated with resin)	40-cubic yard box with general trash	Non-hazardous	MDC	Aug-Dec 1988, 1989, 1990 recycled at A&C Foundry in Portland	Silica sand, trace resins	Solid, yellow-brown, resin-odor	Average of 20 cubic yards/week
Under canopy north of North Foundry	Core sand, Air-set (binder air-dried) and shell core (heat-treated with resin)	20-cubic- yard box	Non-hazardous	MDC	After 1990, Hillsboro Landfill Special Permit 4702	Silica sand, trace resins	Solid, yellow-brown, resin-odor	Average of 20 cubic yards/week
Outside Chip Reclamation Building	Core sand, Air-set (binder air-dried) and shell core (heat-treated with resin)	20-cubic- yard box	Non-hazardous	MDC	After 1990, Hillsboro Landfill Special Permit 4702	Silica sand, trace resins	Solid, yellow-brown, resin-odor	Average of 20 cubic yards/week

21.1 Wastes

Waste Stream	Source	Accumulation Container	Waste Code or Type	Waste Transporter	TSD Facility and/or Recycling Location and How Managed	Chemical Composition	Physical State, Color, and Odor	Rate of Generation
Glycol, water. Hydra-slick (hydraulic fluid)	Foundry	55	Non-hazardous	Thermo Fluids, Inc.	Thermo Fluids, Inc.	Water glycol	Liquid, red, odorless	55 gals/month
Drums, 55-gallon steel	Plant operations	55-gallon drums	Non-hazardous	Calbag	Calbag	Steel	Solid	4/month
Waste oil, coolant, and water mixture	Secondary containment	55-gallon drums	Non-hazardous	Thermo Fluids, Inc.	Thermo Fluids, Inc., incinerated	Petroleum oil and water	Liquid, black, petroleum oil	20 gal/month
Oil, used (machine)	Plant operations	55-gallon drum	Non-hazardous	Thermo Fluids, Inc.	Thermo Fluids, Inc., Oil Recycling	Petroleum oil	Liquid, black, petroleum-odor	55 gal/month
Furnace refractory	Furnace rebuild and maintenance	Drop box	Non-hazardous	MDC	Hillsboro Landfill Special Permit 3132	Unknown	Solid, white, no odor	1 ton/month
Previous Wastes								
Flammable storage room in Radiator Building	Paint-related material (paint solids, thinners)	Various containers in room	Most likely hazardous					No longer in use
Wastewater treatment sludge	Wastewater treatment from radiator manufacturing	55-gallon drums	D008		Chem-Security Systems, Inc.	Lead	Solid	7 drums/month
Pretreated wastewater	Wastewater treatment from radiator manufacturing		Industrial		Sanitary sewer		Liquid	7 gallons/minute
Waste flux solution	Treatment of radiator core and header	55-gallon drums	D002, corrosive		Chem-Security Systems, Inc.		Liquid	50 drums/year
Waste brass cleaner (NuVat)	Cleaning of drawing oil from brass parts	55-gallon drums	D002, corrosive		Chem-Security Systems, Inc.	30% sodium hydroxide, 15% sodium metasilicate	Liquid	40 drums/year
Spent solvent with drawing oil	Cleaning of drawing oil from diesel fuel filters	55-gallon drums	D001, ignitable		Chem-Security Systems, Inc.		Liquid	10 drums/year

The primary non-hazardous and hazardous waste materials were the following:

- Spent core sands
- Aluminum dross (recycled for aluminum)
- Furnace refractory
- Petroleum naphtha (spent solvent)
- Cleanup waste (rags, absorbents)
- Spent coolant (water glycol)
- Waste treatment sludge (from Radiator Plant)
- Non-PCB waste oils (lubricant and machine oils)
- Bead-blast baghouse dust
- Shot-peen baghouse dust
- Chip Reclamation Building baghouse dust
- PCB-containing light ballasts

Raw Materials

The primary raw materials are listed in the table below. See Attachment 14 for the facility's chemical lists.

21.2 Primary Raw Materials				
Raw Material	Chemical Composition	Physical State	Storage	Annual Quantity
LP Gas or Propane	LP Gas or Propane	Liquid	AST	50,000+ gallons ¹
Resin-Coated Sand	Sand with Phenolic Resin	Solid	Bags & boxes	50,000+ pounds ¹
Aluminum Ingots	Aluminum	Solid		50,000+ pounds ¹
Molten Aluminum	Aluminum	Liquid		50,000+ pounds ¹
Silica sand	SiO ₂	Solid	Bags	50,000+ gallons ¹
Glass Impact Spheres	Glass Beads	Solid	Steel drums	50,000+ pounds ¹
Magnesium Ingot	Magnesium	Solid	Fiber drums	10,000+ pounds ¹
Zorbal		Solid	Bags	10,000+ pounds ¹
Acetylene	Acetylene	Gas	Cylinders	10,000+ cubic feet ¹
Argon	Argon	Gas	Cylinders	10,000+ cubic feet ¹
Super Aqua-Solu		Liquid	Steel drums	10,000+ gallons ¹
Sodium	Sodium	Solid		1,000+ pounds ¹
Rando Oil HD 68	Petroleum Oil	Liquid		1,000+ gallons ¹
Hocut 3210 Coolant		Liquid		1,000+ gallons ¹
Trim Sol	Water-Soluble Oil (Machine Coolant)	Liquid	Steel drums	1,000+ gallons ¹
Nucleant No. 2		Solid	Box	1,000+ pounds ¹
NAPAC Sodium Tablets	Sodium	Solid	Bags & cans	1,000+ pounds ¹
Coveral No. 11 Flux		Solid	Fiber drums	1,000+ pounds ¹
Zendox No 10		Solid	Fiber drums	1,000+ pounds ¹
Degaser 190		Solid	Box	1,000+ pounds ¹
Nitrogen	Nitrogen	Gas	Cylinders	1,000+ cubic feet ²
Alstop Grefcon 60		Solid	Bags	1,000+ pounds ²

¹ Oregon State Fire Marshal Hazardous Substance Employer Survey Form dated 1/19/87.

² Oregon State Fire Marshal Hazardous Substance Employer Survey Form dated 2/22/89.

22. *Describe all activities at each Property that was conducted over, on, or adjacent to, the Willamette River. Include in your description whether the activity involved hazardous substances, waste(s), or materials and whether any such hazardous substances, waste(s), or materials were discharged, spilled, disposed of, dropped, or otherwise came to be located in the Willamette River.*

Response 22. Not applicable.

23. *For each Property at which there was or is a mooring facility, dock, wharf or any over-water structure, provide a summary of over-water activities conducted at the structure, including but not limited to, any material loading and unloading operations associated with vessels, materials handling and storage practices, ship berthing and anchoring, ship fueling, and ship building, retrofitting, maintenance, and repair.*

Response 23. Not applicable.

24. *Describe all activities conducted on leased aquatic lands at each Property. Include in your description whether the activity involved hazardous substances, waste(s), or materials and whether any such hazardous substances, waste(s), or materials were discharged, spilled, disposed of, dropped, or otherwise came to be located on such leased aquatic lands.*

Response 24. Not applicable.

25. *Please describe the years of use, purpose, quantity, and duration of any application of pesticides or herbicides on each Property during the period of investigation (1937-present). Provide the brand name of all pesticides or herbicides used.*

Response 25. The only known uses of pesticide sprays were for ant control in the office and wasp control outdoors. The facility contracted a lawn care service that may have used weed control agents in the landscaping and lawns.

26. *Describe how wastes transported off the Property for disposal are and ever were handled, stored, and/or treated prior to transport to the disposal facility.*

Response 26. See answer to Question 21.

27. *Has Respondent ever arranged for disposal or treatment or arranged for transportation for disposal or treatment of materials to any Property (including the Willamette River) within the Investigation Area? If so, please identify every Property that Respondent's materials were disposed or treated at in the Investigation Area. In addition, identify:*
- a. the persons with whom the Respondent made such arrangements;*
 - b. every date on which Respondent made such arrangements;*
 - c. the nature, including the chemical content, characteristics, physical state (e.g., solid, liquid), and quantity (volume and weight) of all materials involved in each such arrangement;*
 - d. in general terms, the nature and quantity of the non-hazardous materials involved in each such arrangement;*
 - e. in general terms, the nature and quantity of any hazardous materials involved in each such arrangement;*
 - f. the owner of the materials involved in each such arrangement, if not Respondent;*
 - g. all tests, analyses, analytical results or manifests concerning each hazardous material involved in such transactions;*
 - h. the address(es) for each Property, precise locations at which each material involved in such transactions actually was disposed or treated;*
 - i. the owner or operator of each facility at which hazardous or non-hazardous materials were arranged to be disposed at within the Investigation Area;*
 - j. who selected the location to which the materials were to be disposed or treated;*
 - k. who selected the Property as the location at which hazardous materials were to be disposed or treated; and*
 - l. any records of such arrangement(s) and each shipment.*

Response 27. There is no known instance of disposal of waste materials at properties (including the Willamette River) within the Investigation Area.

28. *Describe the plants and other buildings or structures where Respondent carried out its operations at each Property within the Investigation Area (excluding locations where ONLY clerical/office work was performed).*

Response 28. A description of the buildings located at the Property is presented in the document entitled *Improvement Description, Portland, Oregon*. The relevant portion of the document is included in Attachment 1.

29. *Provide a schematic diagram or flow chart that fully describes and/or illustrates the Respondent's operations on each Property.*

Response 29. A flowchart describing operations just prior to the cessation of production at the Property is included as Attachment 1. Other parts of the operation are included in:

History of ConMet operations: Attachment 15

Casting Flowchart: Attachment 15

Radiator Plant Flowchart: Attachment 15

Wastewater Flowchart: Attachment 15

30. *Provide a brief description of the nature of Respondent's operations at each location on each Property including:*

- a. *the date such operations commenced and concluded; and*
- b. *the types of work performed at each location, including but not limited to the industrial, chemical, or institutional processes undertaken at each location.*

Response 30. Process categories included the following:

30. Industrial, Chemical, or Institutional Processes Undertaken	
Process	Activity
Foundry Operations—Casting	Melt aluminum and alloys in furnace and melting pots. Add previously prepared shell cores to the permanent molds. Pour molten metal (aluminum plus alloys) into permanent molds. Quench and heat previously cast parts.
—Machining	Machine the cast parts. Collect and recycle water-soluble machine coolant.
—Chip Reclamation	Melt shavings and chips from machining in furnace.
—Hub assembly	Assemble hubs.
Radiator Manufacturing	Produce radiators by welding with solder brass tubing, fins, and headers.

30. Industrial, Chemical, or Institutional Processes Undertaken	
Process	Activity
Air Tanks and Fuel-Water Separator Manufacturing	Clean, weld, and mechanically press parts.
Painting Operations	Paint parts from various product lines in three paint booths.

The dates of operation and locations at the facility are shown on the Operational Timescale diagram – Attachment 15.

31. *If the nature or size of Respondent's operations changed over time, describe those changes and the dates they occurred.*

Response 31. The first building was constructed at the Property in 1964 and the last building constructed was the Warehouse in 1977.

See answer to Question 13 (k) for building construction dates. The building descriptions, sizes, and uses are presented in *Improvement Description, Portland, Oregon* – Attachment 1.

32. *List the types of raw materials used in Respondent's operations, the products manufactured, recycled, recovered, treated, or otherwise processed in these operations.*

Response 32.

32. Raw Materials Used and Products Manufactured, Recycled, Recovered, Treated, or Otherwise Processed	
Raw Material	Product Manufactured or Use
Aluminum	<p>Cast aluminum parts were the primary product produced by ConMet (e.g., aluminum alloy wheel hub assemblies for tractors and trailers).</p> <p>Waste materials produced included aluminum scrap, chips, and dross, which were originally sold to Bockman and Son (mid-1970s to early 1980s) and then to Calbag Metals for recycling. Prior to 1992 aluminum scrap, chips, and dross were shipped to Imco in Post Falls, Idaho, for recycling.</p> <p>From approximately 1992 to mid-1995, aluminum waste was shipped to Imsalco in Goodyear, Arizona (see Attachment 24) for recycling. ConMet paid for shipping and tolling of the aluminum waste and received aluminum sows in return. After mid-1995, aluminum waste was shipped to Imsamet in Wendover, Utah, for recycling.</p>

32. Raw Materials Used and Products Manufactured, Recycled, Recovered, Treated, or Otherwise Processed

Raw Material	Product Manufactured or Use
Resin-coated sand	Resin-coated silica sand used for shell cores
Silica sand	Silica sand used for castings
Coolant	Water-soluble machine coolant used as cutting fluid
Additives, flux	Furnace cleaning
Coatings	Coating with lead-based paints, enamels, and primers
Compressed gases	Propane, oxygen, nitrogen, argon, and acetylene
Hydraulic oil	Used in foundry equipment and presses
Magnesium	Used to produce an aluminum alloy

33. *Provide copies of Material Safety Data Sheets (MSDSs) for materials used in the Respondent's operations.*

Response 33. ConMet maintains MSDSs using the TERMS software program. MSDSs for materials used at the Property are stored in a database. An MSDS is archived if a new product replaces an older one. MSDS records are available from 1986 to the present. A MSDS Product List Report for 2007 is included in Attachment 14.

In addition, lists of hazardous chemicals used at the Property in 1988 and 1991 are included in Attachment 14.

34. *Describe the cleaning and maintenance of the equipment and machinery involved in these operations, including but not limited to:*

- a. the types of materials used to clean/maintain this equipment/machinery;*
- b. the monthly or annual quantity of each such material used;*
- c. the types of materials spilled in Respondent's operations;*
- d. the materials used to clean up those spills;*
- e. the methods used to clean up those spills; and*
- f. where the materials used to clean up those spills were disposed of.*

Response 34. See the table below.

34. Cleaning and Maintenance of Equipment and Machinery

Material Used to Clean or Maintain Equipment/Machinery	Monthly or Annual Quantity Used	Material Spilled	Materials Used to Clean Up Spill	Method Used to Clean Up Spill	Disposal Location for Materials Used to Clean Up Spill
Absorbent material	Up to 50 boxes annually	Oil from equipment and cutting fluids	Dry absorbent.	Absorption	Stored in roll-off box or tote. Disposed of at Spokane Regional - Energy Recovery
Oil	Less than 1,000-gallons annually	Oil from equipment	Dry absorbent	Absorption	55-gallon drum
Petroleum naphtha in parts cleaners		No known spills	Dry absorbent was available, if needed	Absorption	55-gallon drum. Disposed of at Thermo Fluids, Inc.
Hydraulic oil	Unknown	Minor leaks and spills of hydraulic oil	Dry absorbent	Absorption	Stored in roll-off box or tote. Disposed of at Spokane Regional - Energy Recovery
Historic Activities					
Solvents: 1,1,1-trichloroethane	Late 1980s: Small amounts of aerosol cans. Previous use unknown.	No known spills			

A Preventive Maintenance (PM) program was employed at facility since the early 1980s. The Program used to identify and schedule routine tasks are as follows.

1. Fire Prevention
2. Building Maintenance
3. Crane Maintenance
4. Roof Drainage Maintenance
5. Equipment Maintenance
6. Emergency Generator Maintenance

Spill prevention kits were maintained at locations around the facility. The spill kits contained a vacuum barrel, Zorbal, absorbent pads, a fire extinguisher, a shovel, and a broom. The Spill Prevention Control and Countermeasure (SPCC) plan describes response to spill at the facility (see Attachment 4). The spilled material was stored in labeled 55-gallon drums. Spencer (i.e., Thermal Fluids) were then contacted for pickup and proper disposal of waste at off-site disposal facility / landfill.

35. *Describe the methods used to clean up spills of liquid or solid materials during Respondent's operation.*

Response 35. ConMet maintains a SPCC plan for the Property (Attachment 4). The SPCC plan outlines specific procedures used to clean up spills of liquids and solid materials at the Property.

In general, absorbent materials are used to clean up small volume spills liquids. A combination of flushing and vacuuming are used for those spills of liquids that reach the sewer system.

36. *For each type of waste (including by-products) from Respondent's operations, including but not limited to all liquids, sludges, and solids, provide the following information:*

- a. *its physical state;*
- b. *its nature and chemical composition;*
- c. *its color;*
- d. *its odor;*
- e. *the approximate monthly and annual volumes of each types of waste (using such measurements as gallons, cubic yards, pounds, etc.); and*
- f. *the dates (beginning & ending) during which each type of waste was produced by Respondent's operations.*

Response 36. The tables in the answers to Questions 16 and 21 provide the types of wastes generated and their physical state, chemical composition, color, odor, quantities, and dates of generation.

In addition, the Radiator Plant operations (1968 to 1983) also generated waste from a lead solder process, rinse tanks, and test tanks. The sludge waste generated by this process was contained in an underground storage vault that was routinely pumped for disposal. A description of the sludge tank is presented in answer to Question 13(j).

37. *Provide a schematic diagram that indicates which part of Respondent's operations generated each type of waste, including but not limited to wastes generated by cleaning and maintenance of equipment and machinery and wastes resulting from spills of liquid materials.*

Response 37. See tables in Questions 16, 21, and 34's response and Attachment 15.

Cleaning and maintenance of equipment and machinery generated the following wastes:

- Absorbent material
- Antifreeze
- Baghouse waste
- Universal wastes such as batteries, light bulbs
- Compressor blowdown
- Spent machine coolant
- Steel scrap (drums)
- Used oil from equipment maintenance, machine oils, and hydraulic oil
- Furnace refractory

Spills of liquids generated the following wastes:

- Water-soluble machine coolant
- Pine-sol cleaner (one time event)

38. *Identify all individuals who currently have and those who have had responsibility for Respondent's environmental matters (e.g. responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's wastes). Also provide each individual's job title, duties, dates performing those duties, supervisors for those duties, current position or the date of the individual's resignation, and the nature of the information possessed by such individuals concerning Respondent's waste management.*

Response 38. Mr. Ernie Nimister, Manager of Environmental Compliance and Safety, is currently responsible for Consolidated Metco, Inc.'s environmental matters. He was responsible for training, reporting, responding to spills and releases, and maintaining records including waste generation and disposal. Mr. Nimister has been performing these duties for ConMet since 1992. Mr. Nimister's direct supervisor is Mr. Ed Oeltjen, President. The persons responsible for environmental matters are listed in the table on the next page.

38. ConMet Personnel with Responsibility for Environmental Matters

Name	Job Title	Duties	Dates Performing Duties	Supervisors for Duties	Current Position	Resignation Date	Nature of Information Possessed
Ernie Nimister	Manager of Environmental Compliance and Safety	Environmental and health and safety issues	1992 to 2008	Ed Oeltjen	Manager of Environmental Compliance and Safety	Currently in position	Paper and digital documents
Brice Barker	Plant Manager	Environmental, health and safety issues	3/19/90	Ed Oeltjen	VP & GM Plastics and Castings	Currently in position	Paper and digital documents
Don Hill	Plant Manager	Environmental, health and safety issues		Ed Oeltjen	Retired		Paper and digital documents
Charles Joyce	HR Director	Environmental, health and safety issues	Not available	Bob Hodge	Deceased	Not available	Knowledge of this position
Ed Martin	Engineering Manager	Environmental, health and safety issues	Not available	Not available	Deceased	Not available	Knowledge of this position
Ed Ambrose	Chief Engineer	Environmental, health and safety issues	Not available	Not available	Deceased	Not available	Knowledge of this position
Dan Brick	Plant Engineer	Environmental, health and safety issues	Not available	Not available	Deceased	Not available	Knowledge of this position

38. ConMet Personnel with Responsibility for Environmental Matters

Name	Job Title	Duties	Dates Performing Duties	Supervisors for Duties	Current Position	Resignation Date	Nature of Information Possessed
James Adie	General Manager	Environmental, health and safety issues	Not available	Not available	Retired	N/A	Knowledge of this position
Abe Abderhalden	Production Engineer	Environmental, health and safety issues	Not available	Not available	Deceased	N/A	Knowledge of this position

Before Mr. Nimister, the plant managers had the responsibility to manage raw materials, finished product, and waste materials. The plant managers are depicted on the Organization Charts presented in Attachment 1. All of the plant managers are retired or deceased.

39. *For each type of waste describe Respondent's contracts, agreements, or other arrangements for its disposal, treatment, or recycling.*

Response 39. ConMet issued purchase orders, following its usual vendor purchasing process, whenever the disposal, treatment, or recycling of wastes was required.

40. *Provide copies of such contracts and other documents reflecting such agreements or arrangements, including, but not limited to the following:*
- a. *state where Respondent sent each type of its waste for disposal, treatment, or recycling;*
 - b. *identify all entities and individuals who picked up waste from Respondent or who otherwise transported the waste away from Respondent's operations (these companies and individuals shall be called "Waste Carriers" for purposes of this Information Request);*
 - c. *if Respondent transported any of its wastes away from its operations, please so indicate;*
 - d. *for each type of waste specify which Waste Carrier picked it up;*
 - e. *indicate the ultimate disposal/recycling/treatment location for each type of waste;*
 - f. *provide all documents indicating the ultimate disposal/recycling/treatment location for each type of waste; and*
 - g. *state the basis for and provide any documents supporting the answer to the previous question.*

Response 40. See the table in Question 21's response for information on waste carriers and disposal facilities.

The records on waste shipments, permits and manifests are presented in Waste Shipments – Attachment 11; Core Sand – Attachments 12; and Waste Permits – Attachment 13.

41. *Describe all wastes disposed by Respondent into Respondent's drains including but not limited to:*
- a. *the nature and chemical composition of each type of waste;*

- b. *the dates on which those wastes were disposed;*
- c. *the approximate quantity of those wastes disposed by month and year;*
- d. *the location to which these wastes drained (e.g. septic system or storage tank at the Property, pre- treatment plant, Publicly Owned Treatment Works (POTW), etc.); and*
- e. *whether and what pretreatment was provided.*

Response 41. Historical information pertaining to the discharge of wastes into the Property's sanitary sewer system is incomplete.

However, according to a letter to the City of Portland circa 1971, ConMet was discharging both industrial and sanitary wastewater to the Property's onsite septic system (the Property had a septic system from 1964 until 1969 when the Property was connected to the City's POTW). The daily discharge to the septic system included (1) sanitary wastewater from the Casting Plant (i.e., North Foundry), Radiator Building (i.e., South Foundry), and Office Building and (2) industrial wastewater from the Radiator Building. The industrial wastewater from the Radiator Building included the daily discharge of 450 gallons of 2% muriatic acid solution and 2,000 gallons of rinse water from the fin wash tank. The monthly discharge included 300 gallons of Wyandott NuVat (an alkali solution), 300 gallons of Wyandott A & B (an acidic solution), and an unspecified volume of diluted zinc chloride. The letter to the City of Portland is included as Attachment 16.

Following the connection to the City of Portland's sanitary sewer system and POTW, ConMet maintained an industrial waste discharge permit with the city. Copies of the permits for the years from: (1) 1988 to 1993, (2) 1992 to 1997, (3) 1997 to 2002, and (4) 2007 to 2011 are available and are included as Attachment 16. The 1992, 1997, and 2007 permits allow ConMet to discharge sanitary wastewater only to the POTW. ConMet maintained permits for consecutive years; however, permits for 2003 through 2006 could not be located. It should be noted that the permit number (300.013) is the same from 1992 to 2002 and 2007 to 2011.

According to a letter from ConMet to the City of Portland, Office of Public Works Administration, dated June 30, 1981, an unspecified volume of industrial wastewater generated during the manufacturing of radiators was being discharged to the sanitary sewer and POTW. The wastewater was tested for pH, copper, lead, and zinc. Radiator manufacturing ceased at the Property in September 1983. The letter is included as Attachment 16.

A letter from the City of Portland Bureau of Environmental Services, dated January 22, 1988, indicates that an unspecified volume of wastewater from the machine hub cleaning tanks located in the Machine Shop was being discharged to the sanitary sewer during that time. In addition, an internal memorandum from Ernie Nimister dated June 11, 1990, indicates that ConMet was still discharging an unspecified type and volume of industrial

wastewater to the sanitary sewer during that time. The letter and memorandum are included as Attachment 16.

According to Mr. Nimister, beginning in October 1992, ConMet began to operate at 'zero' industrial discharge (i.e., no industrial discharge to the sanitary sewer). This zero industrial discharge is reflected in ConMet's wastewater discharge permits beginning in 1992.

42. *Identify any sewage authority or treatment works to which Respondent's waste was sent.*

Response 42. ConMet was connected to the City of Portland's sanitary sewer system and POTW in 1969. The Property discharged industrial wastewater to the sanitary sewer system until October 1992 (See Question 41 and Attachment 16).

43. *Describe all settling tank, septic system or pretreatment system sludges or other treatment wastes resulting from Respondent's operations.*

Response 43. A septic system was used at the Property from 1964 to 1969. No information is available concerning the type solids removed (if any) from the septic tank during the system's operation.

A pretreatment system for wastewater generated during the manufacturing of radiators was used at the Property until 1983 when radiator production ceased. The pretreatment system operated by precipitating solids and discharging liquids to an underground storage tank (i.e., concrete vault) located between the Radiator Building (i.e., South Foundry) and the North Foundry. The precipitated solids and sludge from the storage tank were taken offsite for disposal. The wastewater was discharged to the onsite septic system until 1969 and then to the City of Portland's POTW until 1983.

According to a December 22, 1980 letter to Mr. Carl Tuenge from Mr. Daniel Brick, Plant Engineer with ConMet, approximately 2,000 pounds of lead-contaminated sludge was being generated by the pretreatment system per month during this time (Attachment 19).

The Property also generated a non-hazardous sludge from the batch-process clay treatment system.

44. *If applicable, describe the facilities, processes and methods Respondent or Respondent's contractor used, and activities engaged in, either currently or in the past, related to ship building, retrofitting, maintenance or repair, including, but not limited to, dry-docking operations, tank cleaning, painting and re-powering.*

Response 44. Not applicable.

45. *Describe any hazardous substances, wastes, or materials used or generated by the activities described in response to the previous Question and how these hazardous substances, materials and wastes were released or disposed of.*

Response 45. Not applicable.

46. *Provide copies of any records you have in your possession, custody or control relative to the activities described in response to the previous two Questions.*

Response 46. Not applicable.

47. *Describe any process or activity conducted on a Property identified in response to Question 4 involving the acquisition, manufacture, use, storage, handling, disposal or release or threatened release of polychlorinated biphenyl(s) ("PCB(s)" or PCB(s)-containing materials or liquids.*

Response 47.

Electrical Transformers. The facility owns five pad-mounted electrical transformers. Oil in the transformers was tested for PCBs in 1986 and 2000. PCBs were detected in the oil of three transformers at concentrations between 13 and 30 parts per million (ppm) during the 1986 testing. In 2000, PCBs were detected in only one sample of transformer oil at a concentration of 25 ppm. The results of the testing are included as Attachment 17.

Non-PCB Waste Water-Soluble Machine Coolant. PCBs were detected in a sample of waste Trim Sol (water-soluble machine coolant) solution according to a November 11, 1991 letter from Mr. Michael Poor of Fuel Processors Incorporated to Mr. Max Upshaw of ConMet. Fuel Processors Incorporated had been retained by ConMet to dispose of waste Trim Sol and the testing of the solution was conducted as part of the disposal process.

In response to this result, ConMet collected 12 additional samples of Trim Sol and analyzed the samples for PCBs. PCBs were not detected in these additional samples. The analytical results of the 12 samples and a letter from Mr. Nimister of ConMet to Mr. Poor of Fuel Processors Incorporated dated February 25, 1992 are included as Attachment 17. Based on these results, ConMet determined that its waste coolant handled by Fuel Processors could not have contained PCBs and that the analytical results reported November 11, 1991, Fuel Processors were in error. In follow-up telephone conversations with Mr. Poor of Fuel Processors circa 1991, ConMet determined that Fuel Processors Incorporated had mixed ConMet's waste coolant (i.e., Trim Sol) with other generators' wastes before its analysis.

In a letter dated December 1, 2006, and included in Attachment 17, the supplier of Trim Sol stated that Trim Sol does not contain PCBs.

Light Ballasts. In 2005, ConMet contracted Earth Protection Services, Inc. (EPSI) to dispose of 322 pounds of PCB-containing light ballasts (see October 12, 2005, letter in Attachment 11C).

48. *For each process or activity identified in response to the previous Question, describe the dates and duration of the activity or process and the quantity and type of PCB(s) or PCB(s) containing materials or liquids.*

Response 48.

Electrical Transformers. A summary of the analytical results of transformer oil and a description of the location of each transformer is presented in the table below.

48. Analytical Results of Transformer Oil				
Transformer	PGE Designation	Location	PCBs (ppm)	
			1986	2000
T9	PD-2215/254	Outside of the western wall of the Machine Shop	30	25
T65	PD-2075/553	Outside of the northwestern corner of the South Foundry (i.e., Radiator Building).	29	not detected
T366	PD-2439/257	1000-KVA, outside of the western wall of the North Foundry	13	not detected
T75	PD-2461/T75	1000-KVA, outside of the northeastern corner of the North Foundry	not detected	not detected
T62	PD-2472/T62	1000-KVA, outside of the northwestern corner of the North Foundry	not detected	not detected

Non-PCB Waste Water-Soluble Machine Coolant. PCBs were detected in a sample of waste Trim Sol (water-soluble machine coolant) solution by a disposal contractor in November 11, 1991 (see Question 47). In response to this result, ConMet collected additional samples of from all Trim Sol wastestream sources and analyzed the samples for PCBs. PCBs were not detected in these additional samples and ConMet determined that its waste coolant handled by Fuel Processors did not contain PCBs. In addition, in telephone conversations with the disposal contractor, ConMet determined that the contractor had mixed ConMet's waste coolant (i.e., Trim Sol) with other generators' wastes before its analysis.

Light Ballasts. In 2005, ConMet contracted EPSI to dispose of 322 pounds of PCB-containing light ballasts removed from the facility's lighting system (see October 12, 2005, letter in Attachment 11C).

49. *For each process or activity identified in response to the previous two Questions, identify the location of the process or activity on the property.*

Response 49. The locations of the transformers are shown (1) on the map entitled *ALTA/ACSM Land Title Survey Consolidated Metco Site*, prepared by WRG Design Inc. and dated September 5, 2002, and (2) described in the table in the answer for Question 48.

The light ballasts were removed from the lighting system in the Office Building.

Section 5.0 Regulatory Information

50. *Identify all federal, state and local authorities that regulated the owner or operator of each Property and/or that interacted with the owner or operator of each Property. Your response is to address all interactions and in particular all contacts from agencies/departments that dealt with health and safety issues and/or environmental concerns.*

Response 50. The table on the following page list federal, state, and local authority interactions.

**50. Documented Interaction of Federal, State, and Local Authorities
with
Consolidated Metco, Inc.**

Federal, State and Local Authority	Interaction
Oregon DEQ	May 27, 1983 letter to Mr. Robert Pawlak of ConMet from Mr. Gary Calaba of DEQ, summarizing DEQ's May 1983 hazardous waste generator inspection of the Property.
	March 13, 1984 letter to Mr. Don Hill of ConMet from Mr. Calaba of DEQ, requesting a reinspection of ConMet's hazardous waste operation.
	Notification of Underground Storage Tanks form completed by Mr. Hill of ConMet on March 13, 1986.
	Issuance of a Minimum Source Air Contaminant Discharge Permit to ConMet on January 16, 1987.
	DEQ's Form 1 (General Facility Information) and Form 3 (Hazardous Waste Generation and Management) completed by Mr. Ernie Nimister of ConMet on February 28, 1992.
	DEQ Source Inspection Form (air permitting conditions) for ConMet completed by Beth Moore of DEQ on July 21, 1994.
	DEQ's Registration Verification Report completed by Mr. Nimister of ConMet on February 1, 1995.
	DEQ Inspection Report for a regularly scheduled inspection on June 24, 2003, pertaining to ConMet's Minimum Source Air Contaminant Discharge Permit.
	May 20, 2003 letter to Mr. Nimister of ConMet from Mr. Christopher Blakeman of DEQ, summarizing DEQ's understanding of the release of water-soluble spent cutting fluid in May 2000 and February 2001 and its recommendations for additional investigation of the Property.
	Voluntary Cleanup Agreement between ConMet and DEQ.
	Issuance of a Standard Air Contaminant Discharge Permit to ConMet on August 6, 2004.
	June 30, 2006 letter to Mr. Nimister of ConMet from DEQ, outlining DEQ's requirements for upland property owners near the Portland Harbor superfund site to characterize their stormwater.
	December 11, 2007 letter to Mr. Nimister from David Cole of DEQ, summarizing DEQ's comments on ConMet's Revised Stormwater Sampling and Analysis Plan and disclosing information DEQ recently received about the alleged past disposal of wastes on the Property.

**50. Documented Interaction of Federal, State, and Local Authorities
with
Consolidated Metco, Inc.
(continued)**

Federal, State and Local Authority	Interaction
Oregon State Fire Marshal	Hazardous Substance Employer Survey Form completed by ConMet on January 19, 1987. Hazardous Substance Employer Survey Form completed by ConMet on February 9, 1988. Hazardous Substance Employer Survey Form completed by Mr. Nimister of ConMet on February 22, 1989. Hazardous Substance Information Survey completed by Mr. Nimister of ConMet on November 9, 2006.
City of Portland	January 22, 1988 letter to Mr. Hill of ConMet from Kelly Hendryx of the City of Portland, summarizing which regulations may affect wastewater discharge from the Property. Issuance of Wastewater Discharge Permit to ConMet for the period from October 10, 1992 to April 1, 1997. Issuance of Wastewater Discharge Permit to ConMet for the period from October 8, 1997 to April 1, 2002. Issuance of Industrial Wastewater Discharge Permit to ConMet for the period from January 1, 2007 to January 15, 2011.
US Department of Transportation	ConMet's Hazardous Materials Certificate of Registration for Registration Year(s) 2006-2008.

DEQ = Department of Environmental Quality

51. *Describe all occurrences associated with violations, citations, deficiencies, and/or accidents concerning each Property during the period being investigated related to health and safety issues and/or environmental concerns. Provide copies of all documents associated with each occurrence described.*

Response 51.

Industrial Wastewater

In the early 1980s, the levels of regulated contaminants in ConMet's industrial wastewater discharge from the Radiator Plant to the sanitary sewer and the City of Portland's POTW exceeded the permitted concentrations (see Attachment 16). Operations at the Radiator Plant ceased in 1983.

Waste Management

A letter dated May 27, 1983 from Mr. Gary Calaba with Oregon DEQ to Mr. Robert Pawlak of ConMet notified ConMet that the "area you selected to store hazardous waste prior to shipping needs to be changed because it slopes toward the storm drain." The letter also requested that ConMet "ensure that barrels of hazardous waste are properly labeled." ConMet resolved this issue by relocating the hazardous wastes to the hazardous-waste-designated area in the northeast section of the Radiator Plant.

In July 1983, Oregon DEQ received an anonymous complaint that 5 gallons of a "material that creates a toxic reaction" when mixed with water had been discharged to a drain in the Radiator Plant. ConMet investigated and determined that (1) ConMet did not use any type of material that creates a toxic reaction when mixed with water and (2) any material entering a drain in the Radiator Plant would be collected in the concrete vault portion of the wastewater treatment system.

Oregon DEQ, in a January 30, 1985, letter from Mr. Calaba to Mr. Don Hill of ConMet, requested that ConMet include the certification statement in all quarterly reports sent to DEQ (see Attachment 19).

Several spills have occurred at the Property. These spills are discussed in Question 62.

No other violations, citations, deficiencies, and/or accidents are known to have occurred at the Property.

52. *Provide a list of all local, state and federal environmental permits ever issued to the owner or operator on each Property (e.g., RCRA permits, NPDES permits, etc.). Please provide a copy of each federal and state permit, and the applications for each permit, ever issued to the owner or operator on each Property.*

Response 52. See table on the following page.

52. Local, State, and Federal Permits			
Permit Type	Regulatory Agency	Permit or Identification No.	Term
NPDES 1200H 1200Z 1200Z 1200Z	Oregon DEQ	OR-003466-5 OR20-0130 OR20-0130 OR20-0130	7-29-92 to 9-30-96 10-20-97 to 6-30-02 9-30-02 to 6-30-07 9-25-07 to 6-30-12
RCRA	USEPA	ORD 009056037	Obtained 11-10-80
Industrial Wastewater Discharge	City of Portland	464-002 300-013 300.013 300.013	1988 to 1993 1992 to 1997 1997 to 2002 § 2007 to 2011
Air Contaminant Discharge Permit	Oregon DEQ	26-1890 26-1890 renewal 26-1890 renewal 26-1890 termination	1-16-87 to 6-01-95 [†] 3-30-98 to 6-01-00 [‡] 8-06-04 to 6-01-09 Expired 2-01-08
Hazardous Material Certificate of Registration	US-DOT	062706 005 008OP 090496 001 010E 053097 008 047F 051898 025 045G 060199 007 016H 051100 006 0071I 0052201 008 043 052805 005 003K 060203 013 039LN	6-28-06 to 6-30-08 9-5-96 to 6-30-97 6-3-97 to 6-30-98 5-20-98 to 6-30-99 6-2-99 to 6-30-00 5-18-00 to 6-30-01 5-31-01 to 6-30-02 5-29-02 to 6-30-03 6-3-03 to 6-30-06

[†] Permit was extended to March 30, 1998

[‡] Permit was extended to August 6, 2004

§ ConMet maintained permits for consecutive years; however, permits for 2003 through 2006 could not be located. It should be noted that the permit number (300.013) is the same from 1992 to 2002 and 2007 to 2011.

53. *Did the owner or operator ever file a Hazardous Waste Activity Notification under the RCRA? If so, provide a copy of such notification.*

Response 53. Yes, Notification No. ORD 009056037 (see Attachment 23).

54. *Did the owner or operator's facility on each Property ever have "interim status" under the RCRA? If so, and the facility does not currently have interim status; describe the circumstances under which the facility lost interim status.*

Response 54. No.

55. *Provide all RCRA Identification Numbers issued to Respondent by EPA or a state for Respondent's operations.*

Response 55. ORD 009056037 issued May 1980 (see Attachment 23).

56. *Identify all federal offices to which Respondent has sent or filed hazardous substance or hazardous waste information. State the years during which such information was sent/filed.*

Response 56.

56. Federal Offices to which Respondent Has Sent or Filed Hazardous Substance or Hazardous Waste Information			
Federal Office	Information Sent	Date	Attachment
U.S. Department of Transportation	Hazardous Material Certificate of Registration	June 28, 2006	24
EPA	Form R	Reporting for years 1993 through 2006	22

57. *Identify all state offices to which Respondent has sent or filed hazardous substance or hazardous waste information. State the years during which such information was sent/filed.*

Response 57.

57. State Offices to which Respondent Has Sent or Filed Hazardous Substance or Hazardous Waste Information			
State Office	Information Sent	Date	Attachment
Oregon DEQ	Quarterly and annual hazardous waste reports	1984 to 2007	19 and 23
	Annual reports and permit applications related to air quality	1987 to 2007	18
State Fire Marshal	SARA Title III annual report	1987 to 2007	21

58. *List all federal and state environmental laws and regulations under which Respondent has reported to federal or state governments, including but not limited to: Toxic Substances Control Act, 15 U.S.C. Sections 2601 et seq., (TSCA); Emergency Planning and Community Right-to-Know Act, 42 U.S.C. Sections 1101 et seq., (EPCRA); and the Clean Water Act (the Water Pollution Prevention and Control Act), 33 U.S.C. Sections 1251 et seq., Oregon Hazardous Substance Remedial Action Law, ORS 465.315, Oregon Water Quality law, ORS Chapters 468(b), Oregon Hazardous Waste and Hazardous Materials law, ORS Chapters 465 and 466, or Oregon Solid Waste law, ORS Chapter 459. Provide copies of each report made, or if only oral reporting was required, identify the federal and state offices to which such report was made.*

Response 58. See table on the following page.

<p style="text-align: center;">58. Federal and State Environmental Laws and Regulations Under which Respondent has Reported to Federal or State Governments</p>		
Federal and State Environmental Law and Regulation	Report	Attachment
Toxic Substances Control Act, 15 U.S.C. Sections 2601 et seq., (TSCA)		
Emergency Planning and Community Right-to-Know Act, 42 U.S.C. Sections 1101 et seq., (EPCRA)	Form R (submitted to DEQ and EPA) and Sara Title III Tier II (submitted to Fire Marshal and DEQ)	21A, 22
Clean Water Act (the Water Pollution Prevention and Control Act), 33 U.S.C. Sections 1251 et seq.	Stormwater discharge monitoring reports	9B
Oregon Hazardous Substance Remedial Action Law, ORS 465.315 (ORS 465.200- 465.545)	Notification of releases of water-soluble machine coolant in May 2000, February 2001, August 2003	See Question 62
Oregon Water Quality Law, ORS Chapters 468(b)		
Oregon Hazardous Waste and Hazardous Materials Law, ORS Chapters 465 and 466	Quarterly report with hazardous waste manifests	19A
	Site Identification Form	23A
Oregon Hazardous Waste and Hazardous Materials Law, Removal or Remedial Action, ORS 465.200, and OAR 340- 122-0010 to 0140	Response to Strategy Recommendations	28
Oregon Solid Waste Law, ORS Chapter 459		
Oregon Air Quality, ORS 468 and OAR 340	Annual report of emissions	18C
Oregon underground storage tank regulation, ORS 466.706 to 466.882 and 466.994	UST registration	7B
Oregon Appropriation of Water Generally law, ORS 537.762	Abandonment of water supply well	5

58.

**Federal and State Environmental Laws and Regulations
Under which Respondent has Reported to
Federal or State Governments**

Federal and State Environmental Law and Regulation	Report	Attachment
Code of the City of Portland, Chapters 17.34 and 17.36	Discharge Certification Reports	16
Code of the City of Portland, 17.34.090 Accidental Spill Prevention and Control	Notification of releases of water-soluble machine coolant in May 2000, February 2001, August 2003	See Question 62
U.S. Department of Transportation	Hazardous materials registration statement	24

59. *Provide a copy of any registrations, notifications, inspections or reports required by the Toxic Substances Control Act, 15 USC § 2601 et seq., or state law, to be maintained or submitted to any government agency, including fire marshal(s), relating to PCB(s) or PCB(s) containing materials or liquids on any Property identified in response to Question 4.*

Response 59. No known notifications. Information on the PCB content of transformers and light ballasts is presented in Attachment 17.

60. *Has Respondent or Respondent's contractors, lessees, tenants, or agents ever contacted, provided notice to, or made a report to the Oregon Department of State Lands ("DSL") or any other state agency concerning an incident, accident, spill, release, or other event involving Respondent's leased state aquatic lands? If so, describe each incident, accident, spill, release, or other event and provide copies of all communications between Respondent or its agents and DSL or the other state agency and all documents that were exchanged between Respondent, its agents and DSL or other state agency.*

Response 60. ConMet has never leased state aquatic lands and is unaware of any contacts to DSL by contractors, lessees, tenants, or agents.

61. *Describe all notice or reporting requirements to DSL that you had under an aquatic lands lease or state law or regulation regarding incidents affecting, or activities or operations occurring on leased aquatic lands. Include the nature of the matter required to be reported and the office or official to whom the notice or report went to. Provide copies of all such notices or reports.*

Response 61. ConMet has never leased DSL aquatic lands and is unaware of any notice or reporting requirements to DSL.

Section 6.0 Releases and Remediation

62. *Identify all leaks, spills, or releases into the environment of any waste, including petroleum, hazardous substances, pollutants, or contaminants, that have occurred at or from each Property, which includes any aquatic lands owned or leased by Respondent. In addition, identify, and provide copies of any documents regarding:*
- a. when such releases occurred;*
 - b. how the releases occurred (e.g. when the substances were being stored, delivered by a vendor, transported or transferred (to or from any tanks, drums, barrels, or recovery units), and treated);*
 - c. the amount of each hazardous substances, pollutants, or contaminants so released;*
 - d. where such releases occurred;*
 - e. any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release;*
 - f. any and all investigations of the circumstances, nature, extent or location of each release or threatened release including, the results of any soil, water (ground and surface) or air testing undertaken;*
 - g. all persons with information relating to these releases; and*
 - h. list all local, state, or federal departments or agencies notified of the release, if applicable.*

Response 62.

ConMet is aware of the following eight leaks, spills, or releases to the environment occurring at the Property:

1. 1969 or 1970: Quench water containing diluted water-soluble machine coolant and spent shell core sand
2. Mid-1980s: Spent, water-soluble machine coolant
3. Early 1990s: Spent, water-soluble machine coolant
4. May 19, 2000: 200 gallons of spent, water-soluble machine coolant
5. February 1, 2001: Approximately 80 gallons of water-soluble machine coolant
6. 2003 or 2004: 3 gallons of wastewater containing Pine-Sol[®] brand cleaner.

7. August 25, 2003: Approximately 15 gallons of water-soluble machine coolant mixed with the water applied by the fire department
8. March 12, 2004: Water-soluble machine coolant

1969 or 1970

1.
 - a. *when such releases occurred;*

The first release occurred in 1969 or 1970.

- b. *how the releases occurred (e.g. when the substances were being stored, delivered by a vendor, transported or transferred (to or from any tanks, drums, barrels, or recovery units), and treated);*

Quench water containing diluted water-soluble machine coolant and spent shell core sand were disposed of in one location on the Property.

- c. *the amount of each hazardous substances, pollutants, or contaminants so released;*

Two to three cubic yards of spent core sand and approximately 200 gallons of quench water containing water-soluble machine coolant were released.

- d. *where such releases occurred;*

The material was disposed of along the northern side of the Chip Reclamation Building.

- e. *any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release;*

The practice occurred over a short time (less than 3 to 4 months). The facility discontinued the practice. A majority of the area (greater 75%) is now paved or under the Chip Reclamation Building. No other response activities were undertaken. The release was discussed in a March 25, 2008, letter from ConMet to Michael Romero of Oregon DEQ (see Attachment 10).

- f. *any and all investigations of the circumstances, nature, extent or location of each release or threatened release including, the results of any soil, water (ground and surface) or air testing undertaken;*

No investigations were undertaken.

- g. *all persons with information relating to these releases; and*

Mr. Nimister and Mr. Chuck Levin, a retired employee with 38 years of service at the Property.

- h. list all local, state, or federal departments or agencies notified of the release, if applicable.*

The release was discussed in a March 25, 2008, letter from ConMet to Michael Romero of Oregon DEQ (see Attachment 10).

Mid-1980s

2. *a. when such releases occurred;*

The second release occurred in the mid-1980s.

- b. how the releases occurred (e.g. when the substances were being stored, delivered by a vendor, transported or transferred (to or from any tanks, drums, barrels, or recovery units), and treated);*

Spent, water-soluble machine coolant leaked from machining equipment onto the floor of the Machine Shop. The fluid seeped between the building's steel panel walls and concrete floor to the ground surface outside of the building.

- c. the amount of each hazardous substances, pollutants, or contaminants so released;*

An unknown amount of the fluid was released.

- d. where such releases occurred;*

The fluid was released to the ground surface north of the Machine Shop.

- e. any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release;*

The leak was stopped approximately 24 years ago and there is no ongoing release. One-half of this area has been paved with concrete. Therefore, the potential for this area to represent a source of contamination to the Site's stormwater discharge is extremely low to non-existent. No other response activities were undertaken. The release was discussed in a March 25, 2008, letter from ConMet to Michael Romero of Oregon DEQ (see Attachment 10).

- f. any and all investigations of the circumstances, nature, extent or location of each release or threatened release including, the results of any soil, water (ground and surface) or air testing undertaken;*

No investigations were undertaken.

- g. *all persons with information relating to these releases; and*

Mr. Nimister and Mr. Levin.

- h. *list all local, state, or federal departments or agencies notified of the release, if applicable.*

The release was discussed in a March 25, 2008, letter from ConMet to Michael Romero of Oregon DEQ (see Attachment 10).

Early 1990s

3. a. *when such releases occurred;*

The third release occurred in the early 1990s.

- b. *how the releases occurred (e.g. when the substances were being stored, delivered by a vendor, transported or transferred (to or from any tanks, drums, barrels, or recovery units), and treated);*

Rain water entered a drop box storing spent absorbent materials (containing spent, water-soluble machine coolant). Rain water contacted the spent absorbent material because the cover for the drop box was not closed. Rain water subsequently drained from the box onto asphalt pavement and eventually flowed to a storm sewer catch basin.

- c. *the amount of each hazardous substances, pollutants, or contaminants so released;*

An unknown, but small amount of fluid was released.

- d. *where such releases occurred;*

The fluid was released to asphalt-paved ground surface and catch basin located between the North and South Foundry Buildings.

- e. *any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release;*

ConMet immediately stopped the leak from the box, pumped the fluids out of the catch basin, cleaned the asphalt between the box and the catch basin, and covered the drop box.

The catch basin was pumped and cleaned of fluids. There have been no subsequent releases from this drop-box. Based on the very small volume of material released and the subsequent cleanup, this event represents a minimal and wholly past source of contamination to the Site's stormwater discharge.

The release was discussed in a March 25, 2008, letter from ConMet to Michael Romero of Oregon DEQ (see Attachment 10).

- f. any and all investigations of the circumstances, nature, extent or location of each release or threatened release including, the results of any soil, water (ground and surface) or air testing undertaken;*

No investigations were undertaken or necessary due to the immediate actions taken.

- g. all persons with information relating to these releases; and*

Mr. Nimister.

- h. list all local, state, or federal departments or agencies notified of the release, if applicable.*

The release was discussed in a March 25, 2008, letter from ConMet to Michael Romero of Oregon DEQ (see Attachment 10).

May 19, 2000

- 4.** *a. when such releases occurred;*

The fourth release occurred on May 19, 2000.

- b. how the releases occurred (e.g. when the substances were being stored, delivered by a vendor, transported or transferred (to or from any tanks, drums, barrels, or recovery units), and treated);*

Spent, water-soluble machine coolant was spilled from a portable aboveground storage tank (AST) while the tank was being moved.

- c. the amount of each hazardous substances, pollutants, or contaminants so released;*

Approximately 200 gallons of the fluid was released.

- d. where such releases occurred;*

The fluid was released to asphalt pavement and a storm sewer catch basin located between the Machine Shop to the South Foundry.

- e. any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release;*

Approximately 130 gallons of the fluid was recovered from the spill site. ConMet retained Professional Pipe Service to flush the storm sewer system.

Professional Pipe Service flushed and recovered approximately 1,400 gallons of water from the storm sewer using a vacuum truck.

ConMet notified: (1) Oregon Emergency Response System (OERS [OERS No. 00-1104]), (2) Oregon Department of Environmental Quality (DEQ), and (3) City of Portland Environmental Services.

- f. any and all investigations of the circumstances, nature, extent or location of each release or threatened release including, the results of any soil, water (ground and surface) or air testing undertaken;*

No investigations were undertaken due to the immediate response in pumping the storm sewer.

- g. all persons with information relating to these releases; and*

Mr. Nimister.

- h. list all local, state, or federal departments or agencies notified of the release, if applicable.*

ConMet notified: (1) OERS, (2) DEQ, and (3) City of Portland Environmental Services.

February 1, 2001

5. *a. when such releases occurred;*

The fifth release occurred on February 1, 2001.

- b. how the releases occurred (e.g. when the substances were being stored, delivered by a vendor, transported or transferred (to or from any tanks, drums, barrels, or recovery units), and treated);*

Water-soluble machine coolant leaked from underground piping for 3 to 6 months. The piping was used to transfer reclaimed water-soluble machine coolant from the Chip Reclamation Building to the Machine Shop.

- c. the amount of each hazardous substances, pollutants, or contaminants so released;*

Approximately 80 gallons of fluid was released.

- d. where such releases occurred;*

The fluid was released from the piping to the subsurface located between the Chip Reclamation Building and the Machine Shop. The fluid migrated to a catch basin for the storm sewer system located between the two buildings and then to the Willamette River via the sewer.

- e. *any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release;*

ConMet's immediate response included placing absorbent devices on the Willamette River at the outfall for the storm sewer system (Outfall 53A) and removing approximately 100 gallons of diluted fluid from the catch basin. Next, ConMet retained Pro-Pipe to flush the storm sewer system. Approximately 3,000 gallons of water and other material were flushed from the storm sewer system and collected using a vacuum truck. The material was transported to Spencer Environmental Service for disposal.

On February 1 and 2, 2001, ConMet excavated several pits around the catch basin and a trench to expose the underground piping and identify the leak in the piping. Approximately 1,500 gallons of liquid was collected from the pits and trench and placed in ConMet's onsite evaporator. In addition, ConMet repaired the leak in the piping.

Approximately 15.5 tons of soil excavated from the pits and trench were transported and disposed of at Waste Management's Hillsboro Landfill on March 26, 2001.

ConMet notified: (1) OERS (OERS No. 01-0241), (2) DEQ, and (3) City of Portland Environmental Services.

- f. *any and all investigations of the circumstances, nature, extent or location of each release or threatened release including, the results of any soil, water (ground and surface) or air testing undertaken;*

On February 2, 2001, ConMet collected a soil and groundwater sample from a pit excavated near the catch basin. Diesel range organics and heavy oil range hydrocarbons were detected in the soil and groundwater samples. The laboratory analytical results are presented in the report entitled *Spill/Release Report, OERS No.-01-0241*, dated March 9, 2001.

On February 21 and 27, 2001, ConMet retained a consultant to drill nine soil borings near the underground piping and the catch basin. Thirteen soil samples and 5 groundwater samples were collected and analyzed from the borings. Diesel range organics and/or heavy oil range hydrocarbons were detected in 10 soil samples and 5 groundwater samples. Polycyclic aromatic hydrocarbons (PAHs) were detected in 2 soil and 2 groundwater samples.

A complete discussion of the results is presented in the report entitled *Environmental Sampling Report, Prepared for Consolidated Metco Rivergate Facility*, by Kennedy/Jenks Consultants, and dated 10 May 2001.

Machine coolant has not been observed in the catch basin (or river) since the leak was discovered and repaired indicating that this event has a minimal and wholly

past potential to act as a continuing source of contamination to the Site's stormwater discharge. Catch basins are inspected monthly as specified in the facility's Storm Water Pollution Control Plan (Attachment 9D).

- g. all persons with information relating to these releases; and*

Mr. Nimister.

- h. list all local, state, or federal departments or agencies notified of the release, if applicable.*

ConMet notified: (1) OERS, (2) DEQ, and (3) City of Portland Environmental Services.

2003 or 2004

6. *a. when such releases occurred;*

The sixth release occurred in either 2003 or 2004.

- b. how the releases occurred (e.g. when the substances were being stored, delivered by a vendor, transported or transferred (to or from any tanks, drums, barrels, or recovery units), and treated);*

Wastewater containing Pine-Sol[®] brand cleaner generated during the mopping and cleaning of floors in the Office Building was poured into a storm sewer catch basin.

- c. the amount of each hazardous substances, pollutants, or contaminants so released;*

Approximately 3 gallons.

- d. where such releases occurred;*

The wastewater was poured into a catch basin located between the Office Building and North Foundry.

- e. any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release;*

The catch basin was pumped and cleaned of fluids. The janitorial service was notified and counseled on proper disposal of janitorial cleaning fluids, including the retraining in the facility's contractor/vendor orientation program and procedures. Vacuums were used to remove fluids from the stormwater catch basin and the fluid was properly discharged to the sanitary sewer system. Based on the very small volume release of a household cleaner, this event does not represent a source of contamination to the Site's stormwater discharge.

The release was discussed in a March 25, 2008, letter from ConMet to Michael Romero of Oregon DEQ (see Attachment 10).

- f. any and all investigations of the circumstances, nature, extent or location of each release or threatened release including, the results of any soil, water (ground and surface) or air testing undertaken;*

No investigations were undertaken due to the nonhazardous type of material released.

- g. all persons with information relating to these releases; and*

Mr. Nimister.

- h. list all local, state, or federal departments or agencies notified of the release, if applicable.*

The release was discussed in a March 25, 2008, letter from ConMet to Michael Romero of Oregon DEQ (see Attachment 10).

August 25, 2003

7. *a. when such releases occurred;*

The seventh release occurred on August 25, 2003.

- b. how the releases occurred (e.g. when the substances were being stored, delivered by a vendor, transported or transferred (to or from any tanks, drums, barrels, or recovery units), and treated);*

On the morning of August 25, the City of Portland Fire Department was called to the Property to cool (with water) a "hot spot" that had developed in the chip melting system located in the Chip Reclamation Building. The release occurred after water used to cool the hot spot filled the system's coolant containment tank and caused the tank to overflow onto the floor of the building and outside into a storm sewer catch basin.

- c. the amount of each hazardous substances, pollutants, or contaminants so released;*

An unknown volume of water-soluble machine coolant mixed with the water applied by the fire department was released to the storm sewer. However, ConMet personnel estimated that approximately 15 gallons of the mixture flowed to the Willamette River through Outfall 53A.

- d. where such releases occurred;*

Between the Chip Reclamation Building and the North Foundry.

- e. *any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release;*

The fire department and ConMet immediately placed absorbent socks around the catch basin and placed a flexible, polyurethane drain-blocker over the catch basin. An absorbent boom was later placed on the Willamette River opposite the outfall.

ConMet retained Spencer Environmental Services to pressure wash the catch basin, flush and vacuum the storm sewer (to within approximately 100 feet of Outfall 53A), clean the ground surface, and collect water that did not enter the storm sewer and had collected on the ground surface. Spencer Environmental Services collected approximately 3,717 gallons of fluids during these activities.

ConMet notified: (1) OERS (OERS No. 03-1867), (2) DEQ, and (3) City of Portland Environmental Services.

- f. *any and all investigations of the circumstances, nature, extent or location of each release or threatened release including, the results of any soil, water (ground and surface) or air testing undertaken;*

No investigations were undertaken due to the immediate response taken.

- g. *all persons with information relating to these releases; and*

Mr. Nimister.

- h. *list all local, state, or federal departments or agencies notified of the release, if applicable.*

ConMet notified: (1) OERS, (2) DEQ, and (3) City of Portland Environmental Services.

March 12, 2004

8. a. *when such releases occurred;*

The eighth release occurred on March 12, 2004.

- b. *how the releases occurred (e.g. when the substances were being stored, delivered by a vendor, transported or transferred (to or from any tanks, drums, barrels, or recovery units), and treated);*

Diluted water-soluble machine coolant leaked from the exposed aboveground fitting that leads to underground piping used to transfer the coolant from the Chip Reclamation Building to the Machine Shop.

- c. *the amount of each hazardous substances, pollutants, or contaminants so released;*

The amount of diluted water-soluble machine coolant released is believed to be less than 5 gallons.

- d. *where such releases occurred;*

Water-soluble machine coolant was released to the stormwater catch basin. The coolant was observed in the catch basin between the two buildings. However, coolant was not observed in the storm sewer downgradient of the catch basin.

- e. *any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release;*

ConMet immediately turned off the pump used to transfer the water-soluble machine coolant through the underground piping and placed absorbent socks in the storm sewer downgradient of the catch basin. Vacuums were used to remove fluids from the storm sewer system at the catch basin and downgradient of the catch basin.

Later that day, Thermal Fluids (retained by ConMet) flushed and vacuumed the storm sewer system. Thermal Fluids collected and disposed of 500 gallons of fluids. All machining fluids were contained on site with no offsite release of machine coolant.

No agency or governmental unit was notified of the release.

- f. *any and all investigations of the circumstances, nature, extent or location of each release or threatened release including, the results of any soil, water (ground and surface) or air testing undertaken;*

No investigations were undertaken.

- g. *all persons with information relating to these releases; and*

Mr. Nimister.

- h. *list all local, state, or federal departments or agencies notified of the release, if applicable.*

No local, state, or federal departments or agencies were notified of the release.

63. *Was there ever a spill, leak, release, or discharge of waste including petroleum, or hazardous substances, pollutant or contaminant into any subsurface disposal system or floor drain inside or under a building on the Property? If the answer to the preceding question is anything but an unqualified "no", identify:*
- a. where the disposal system or floor drains were located;*
 - b. when the disposal system or floor drains were installed;*
 - c. whether the disposal system or floor drains were connected to pipes;*
 - d. where such pipes were located and emptied;*
 - e. when such pipes were installed;*
 - f. how and when such pipes were replaced, or repaired; and*
 - g. whether such pipes ever leaked or in any way released such waste or hazardous substances into the environment.*

Response 63.

Radiator Plant Wastewater Treatment System

Radiators were manufactured at the Property from approximately 1968 to 1983 in the South Foundry (i.e., the former Radiator Building). Wastewater generated during the manufacture of radiators was treated prior to discharge to the sanitary sewer system. Wastewater was discharged to a drain and conveyed by underground piping to an underground concrete vault located between the South Foundry and North Foundry. The in-ground concrete vault was used to precipitate metals from the wastewater. Based on waste manifests, it appears that sludge contained in the vault was removed and disposed of as a hazardous waste (due to lead content) at licensed facilities. The vault was removed in February 1987.

After the metals were precipitated, the wastewater was initially discharged to the Property's onsite septic tank and leachfield. After circa 1969, the wastewater was discharged to the City of Portland's POTW.

According to a document entitled *Sampling and Analysis Plan and Site Characterization for a Buried Concrete Vault at Consolidated Metco Incorporated* prepared by Century Environmental Sciences and dated November 22, 1985, Pegasus Waste Management Incorporated was retained by ConMet in October 1985 to remove and dispose of liquid waste from the concrete vault (see Attachment 7). According to the document, Pegasus Waste Management Incorporated observed during these activities that "the vault was refilling with water" and "determined that the ground water was entering the vault via a pipe extending into the vault from the vault floor."

Underground Storage Tank

A 400-gallon UST was located in the grass-covered area south of the South Foundry. The tank was part of a spill containment system for a paint storage room located in the building. A floor drain in the room was connected to the tank via underground piping. The tank was removed in 2004 (see Attachment 16). There is no evidence that the tank or its piping leaked.

64. *Has any contaminated soil ever been excavated or removed from the Property? Unless the answer to the preceding question is anything besides an unequivocal "no", identify and provide copies of any documents regarding:*

a. *amount of soil excavated;*

Response 64a. 15.5 tons.

b. *location of excavation presented on a map or aerial photograph;*

Response 64b. See Figure 2 in the report entitled *Environmental Sampling Report*, prepared for Consolidated Metco Rivergate Facility by Kennedy/Jenks Consultants, and dated 10 May 2001 (in Attachment 6).

c. *manner and place of disposal and/or storage of excavated soil;*

Response 64c. The soil was disposed of at Waste Management's Hillsboro Landfill in Hillsboro, Oregon.

d. *dates of soil excavation;*

Response 64d. The soil was excavated on February 2, 2001.

e. *identify of persons who excavated or removed the soil, if other than a contractor for Respondent;*

Response 64e. Kennedy/Jenks Consultants.

f. *reason for soil excavation;*

Response 64f. The soil was excavated as part of a February 2001 investigation into the release of water-soluble machine coolant from underground piping used to convey the coolant from the Chip Reclamation Building to the Machine Shop.

g. *whether the excavation or removed soil contained hazardous substances, pollutants or contaminants, including petroleum, what constituents the soil contained, and why the soil contained such constituents;*

Response 64g. Diesel range organics were detected at a concentration of 15,500 milligrams per kilogram (mg/kg) and heavy-oil range hydrocarbons were

detected at a concentration of 8,530 mg/kg in a sample collected from the excavated soil. The results indicate that the soil was in contact with the water-soluble machine coolant.

- h. all analyses or tests and results of analyses of the soil that was removed from the Property;*

Response 64h. The analytical results are presented in Appendix C of the report entitled *Environmental Sampling Report*, Prepared for Consolidated Metco Rivergate Facility by Kennedy/Jenks Consultants, and dated 10 May 2001.

- i. all analyses or tests and results of analyses of the excavated area after the soil was removed from the Property; and*

Response 64i. Samples were not collected from the excavation. However, ConMet retained a consultant to drill nine soil borings near the underground piping. Thirteen soil samples and 5 groundwater samples were collected and analyzed from the borings. Diesel range organics and/or heavy-oil range hydrocarbons were detected in 10 soil samples and 5 groundwater samples. Polycyclic aromatic hydrocarbons were detected in 2 soil and 2 groundwater samples.

A complete discussion of the results is presented in the report entitled *Environmental Sampling Report*, prepared for Consolidated Metco Rivergate Facility by Kennedy/Jenks Consultants, and dated 10 May 2001.

- j. all persons, including contractors, with information about (a) through (i) of this request.*

Response 64j. Mr. Nimister and Kennedy/Jenks Consultants.

65. *Have you ever tested the groundwater under your Property? If so, please provide copies of all data, analysis, and reports generated from such testing.*

Response 65. Groundwater samples were collected from five soil borings drilled as part of a February 2001 Investigation into the release of water-soluble machine coolant from underground piping. The underground piping runs from the Chip Reclamation Building to the Machine Shop.

The analytical results for the groundwater samples are presented in the report entitled *Environmental Sampling Report*, prepared for Consolidated Metco Rivergate Facility by Kennedy/Jenks Consultants, and dated 10 May 2001.

66. *Have you treated, pumped, or taken any kind of response action on groundwater under your Property? Unless the answer to the preceding question is anything besides an unequivocal "no", identify and provide copies of any documents regarding:*

- a. reason for groundwater action;*
- b. whether the groundwater contained hazardous substances, pollutants or contaminants, including petroleum, what constituents the groundwater contained, and why the groundwater contained such constituents;*
- c. all analyses or tests and results of analyses of the groundwater;*
- d. if the groundwater action has been completed, describe the basis for ending the groundwater action; and*
- e. all persons, including contractors, with information about (a) through (c) of this request.*

Response 66. ConMet has not treated, pumped, or taken a response action on groundwater under its Property.

67. *Was there ever a spill, leak, release or discharge of a hazardous substance, waste, or material into the Willamette River from any equipment, structure, or activity occurring on, over, or adjacent to the river? If the answer to the preceding question is anything but an unequivocal "no", identify and provide copies of any documents regarding:*

- a. the nature of the hazardous substance, waste, or material spilled, leaked, released or discharged;*

Response 67a. Spent water-soluble machine coolant.

- b. the dates of each such occurrence;*

Response 67b.

- February 1, 2001.
- August 25, 2003

- c. the amount and location of such release;*

Response 67c.

February 1, 2001

Water-soluble machine coolant, leaking from underground piping, was released to the subsurface soil between the Chip Reclamation Building and the Machine Shop. The fluid migrated to a catch basin for the storm sewer system located

between the two buildings and then to the Willamette River via the sewer. Approximately 80 gallons of water soluble machine coolant was released.

August 25, 2003

On the morning of August 25, the City of Portland Fire Department was called to the Property to cool (with water) a "hot spot" that had developed in the chip melting system located in the Chip Reclamation Building. The release occurred after water used to cool the hot spot filled the system's coolant containment tank and caused the tank to overflow onto the floor of the building and outside into a storm sewer catch basin. An unknown volume of the mixture of water and machine coolant was released. However, ConMet estimated that approximately 15 gallons of the mixture flowed to the Willamette River.

- d. *were sheens on the river created by the release;*

Response 67d.

February 1, 2001

Yes. A 20-foot by 50-foot sheen was observed on the Willamette River opposite the outfall for the storm sewer system (i.e., Outfall 53A).

August 25, 2003

Yes. Photographs taken on August 25, 2003, indicate that there was a small sheen on the river opposite Outfall 53A.

- e. *was there ever a need to remove or dredge any solid waste, bulk product, or other material from the river as a result of the release? If so, please provide information and description of when such removal/dredging occurred, why, and where the removed/dredged materials were disposed.*

Response 67e. No.

68. *For any releases or threatened releases of PCB(s), identify the date, quantity, location and type of PCB(s), or PCB(s) containing materials or liquids, and the nature of any response to or cleanup of the release.*

Response 68. ConMet is not aware of any releases or threatened releases of PCB(s).

69. *For any releases or threatened releases of PCB(s) and/or PCB(s) containing materials or liquids, identify and provide copies of any documents regarding the quantity and type of waste generated as a result of the release or threatened release, the disposition of the waste, provide any reports or records relating to the release or threatened release, the response or cleanup and any records relating to any enforcement proceeding relating to the release or threatened release.*

Response 69. Not applicable.

Section 7.0 Property Investigations

70. *Provide information and documentation concerning all inspections, evaluations, safety audits, correspondence and any other documents associated with the conditions, practices, and/or procedures at the Property concerning insurance issues or insurance coverage matters.*

Response 70. Attachment 20 includes the only known insurance inspection reports. FM Global inspected the facility in 2003, 2005, and 2007.

71. *Describe the purpose for, the date of initiation and completion, and the results of any investigations of soil, water (ground or surface), sediment, geology, and hydrology or air quality on or about each Property. Provide copies of all data, reports, and other documents that were generated by you or a consultant, or a federal or state regulatory agency related to the investigations that are described.*

Response 71.

ConMet has conducted two investigations of soil, water, sediment, geology, and hydrology on the Property. These investigations included collecting and analyzing (1) soil and groundwater samples in 2001 and (2) storm water and sediment samples in 2007 and 2008.

2001 Subsurface Investigation

In February 2001, a consultant retained by ConMet collected 13 soil and 5 groundwater samples from nine soil borings drilled near underground piping running from the Chip Reclamation Building to the Machine Shop. The piping was found to be leaking water-soluble machine coolant to the subsurface soil.

Diesel range organics and/or heavy-oil range hydrocarbons were detected in 10 soil samples and 5 groundwater samples. Polycyclic aromatic hydrocarbons (PAHs) were detected in 2 soil and 2 groundwater samples. The results of this investigation are presented in the report entitled *Environmental Sampling Report*, prepared for Consolidated Metco Rivergate Facility by Kennedy/Jenks Consultants, and dated 10 May 2001.

ConMet entered Oregon's Voluntary Cleanup Program in 2003. ConMet anticipates receiving a No Further Action letter for the investigation in 2008.

Storm Sewer Investigation

The storm sewer investigation consisted of collecting and analyzing (1) sediment samples from three catch basins located on the Property in March 2007 and (2) storm water samples from three locations on the Property in June, October, and November 2007 and

January 2008. Reports presenting the results of the sampling are included as Attachment 9B.

Sediment Samples. Bis(2-ethylhexyl)phthalate (a phthalate ester) was detected in the three sediment samples at concentrations exceeding its DEQ Joint Source Control Strategy (JSCS) screening levels. In addition, benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(g,h,i)perylene, chrysene, fluoranthene, indeno(1,2,3-cd)pyrene, and pyrene (all PAHs) were detected in one sediment sample at concentrations exceeding their DEQ JSCS screening levels.

Storm Water Samples. ConMet detected: (1) copper, lead, and zinc at concentrations exceeding their DEQ JSCS screening levels in the storm water samples collected in June and October 2007, (2) zinc at a concentration exceeding its DEQ JSCS screening level in the storm water samples collected in November 2007, and (3) one or more of the following copper, lead, zinc, bis(2-ethylhexyl)phthalate, benzo(b)fluoranthene, benzo(g,h,i)perylene, and chrysene at concentrations exceeding their DEQ JSCS screening levels in the storm water samples collected in January 2008.

The analytical results of the sediment and storm water samples are included in the letter reports included as Attachment 9B.

72. *Describe any remediation or response actions you or your agents or consultants have ever taken on each Property either voluntarily or as required by any state or federal agency. If not otherwise already provided under this Information Request, provide copies of all investigations, risk assessments or risk evaluations, feasibility studies, alternatives analysis, implementation plans, decision documents, monitoring plans, maintenance plans, completion reports, or other document concerning remediation or response actions taken on each Property.*

Response 72. Approximately 15.5 tons of soil was excavated, transported, and disposed of at Waste Management's Hillsboro Landfill as part of the 2001 investigation into the leaking underground piping located between the Chip Reclamation Building and Machine Shop. The soil was generated during an excavation to expose the underground piping (and discover the leak).

Information about the excavation, transportation, and disposal of the soil is presented in the report entitled *Environmental Sampling Report*, Prepared for Consolidated Metco Rivergate Facility by Kennedy/Jenks Consultants, and dated 10 May 2001.

Several spills have occurred at the Property. ConMet's response to these spills is discussed as part of Question No. 62.

73. *Are you or your consultants planning to perform any investigations of the soil, water (ground or surface), geology, hydrology, and/or air quality on or about the Property? If so, identify:*

- a. what the nature and scope of these investigations will be;*
- b. the contractors or other persons that will undertake these investigations;*
- c. the purpose of the investigations;*
- d. the dates when such investigations will take place and be completed; and*
- e. where on the Property such investigations will take place.*

Response 73. No further investigations are currently planned on or about the Property.

Section 8.0 Corporate Information

74. *Provide the following information, when applicable, about you and/or your business(es) that are associated with each Property identified in response to Question 4:*

- a. *state the current legal ownership structure (e.g., corporation, sole proprietorship);*

Response 74a. Consolidated Metco, Inc. is a corporation organized under the laws of the State of Delaware. ConMet owns one property at 13940 North Rivergate Boulevard within the Investigation Area.

- b. *state the names and current addresses of current and past owners of the business entity or, if a corporation, current and past officers and directors;*

Response 74b. See the table on the following page.

<p align="center">74. Current and Past Owners of Business Entity Consolidated Metco, Inc. 13940 North Rivergate Boulevard</p>		
Year	Owner	Name and Current Address of Officers and Directors
1964 to 1981	Consolidated Freightways	Not available—on September 3, 2002, the Company filed Chapter 11 bankruptcy protection with the US Bankruptcy Court of the Central District of California
1981 to 1989	Daimler Benz	<p>Daimler Trucks North America, LLC (Formerly Freightliner Trucks, LLC) Chris Patterson, President & CEO Roger Nielsen, COO Juergen Kritschgau, CFO</p> <p>4747 N. Channel Avenue, Portland, Oregon 97217</p> <p>Daimler Trucks North America, LLC is a fully owned subsidiary of Daimler AG Dr. Dieter Zetsche, Chairman of the Board Gunther Fleig, Board of Management Dr. Rudiger Grube, Board of Management Andreas Renschler, Board of Management Bodo Uebber, Board of Management Dr. Thomas Weber, Board of Management</p> <p>70546 Stuttgart, Germany</p>
1989 to 1990	Hodge/Harman/Oeltjen	<p>Ed J. Oeltjen Bob Hodge Michael P. Harman, Sr</p> <p>PO Box 82301, Portland OR 97283</p>
1990 to 1999	Varlen Corporation	N/A – Varlen Corporation was fully acquired by Amsted Industries Incorporated in August 1999

<p style="text-align: center;">74. Current and Past Owners of Business Entity Consolidated Metco, Inc. 13940 North Rivergate Boulevard</p>		
Year	Owner	Name and Current Address of Officers and Directors
1999 to Present	Amsted Industries Incorporated	<p>Officers: W. Robert Reum, Chairman, President and CEO Stephen R. Smith, VP, General Counsel & Secretary Stephen Gregory, VP Finance, CFO Shirley Whitesell, VP People Matthew Hower, VP Treasurer Stephen Obendorf, Controller</p> <p>Directors: Lewis Collens John M. Dixon Raymond A Jean William E Moeller W. Robert Reum Richard E. Terry Thomas H. Weidemeyer</p> <p>Two Prudential Plaza 180 N. Stetson Street, Suite 1800 Chicago, IL 60601</p>

- c. *discuss all changes in the business' legal ownership structure, including any corporate successorship, since the inception of the business entity. For example, a business that starts as a sole proprietorship, but then incorporates after a few years, or a business that is subsequently acquired by and merged into a successor. Please include the dates and the names of all parties involved;*

Response 74c. See Item b.

- d. *the names and addresses of all current or past business entities or subsidiaries in which you or your business has or had an interest that have had any operational or ownership connection with the Properties identified in the response to Question 4. Briefly describe the business activities of each such identified business entities or subsidiaries; and*

Response 74d. See Item b.

- e. *if your business formerly owned or operated a Property identified in response to Question 4, describe any arrangements made with successor owners or operators regarding liability for environmental contamination or property damage.*

Response 74e. Not applicable—current owner.

75. *List all names under which your company or business has ever operated and has ever been incorporated. For each name, provide the following information:*

- a. *whether the company or business continues to exist, indicating the date and means by which it ceased operations (e.g., dissolution, bankruptcy, sale) if it is no longer in business;*
- b. *names, addresses, and telephone numbers of all registered agents, officers, and operations management personnel; and*
- c. *names, addresses, and telephone numbers of all subsidiaries, unincorporated divisions or operating units, affiliates, and parent corporations if any, of the Respondent.*

Response 75. The business has operated under one name, Consolidated Metco, Inc., which continues to exist. See item 74 (b).

76. *Provide all copies of the Respondent's authority to do business in Oregon. Include all authorizations, withdrawals, suspensions and reinstatements.*

Response 76. See Attachment 1.

77. *If Respondent is, or was at any time, a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity, then describe the full nature of each such corporate relationship, including but not limited to:*

- a. *a general statement of the nature of relationship, indicating whether or not the affiliated entity had, or exercised, any degree of control over the daily operations or decision-making of the Respondent's business operations at the Site;*
- b. *the dates such relationship existed;*
- c. *the percentage of ownership of Respondent that is held by such other entity(ies);*
- d. *for each such affiliated entity provide the names and complete addresses of its parent, subsidiary, and otherwise affiliated entities, as well as the names and addresses of each such affiliated entity's officers, directors, partners, trustees, beneficiaries, and/or shareholders owning more than five percent of that affiliated entity's stock;*

- e. *provide any and all insurance policies for such affiliated entity(ies) which may possibly cover the liabilities of the Respondent at each Property; and*
- f. *provide any and all corporate financial information of such affiliated entities, including but not limited to total revenue or total sales, net income, depreciation, total assets and total current assets, total liabilities and total current liabilities, net working capital (or net current assets), and net worth.*

Response 77. Affiliated entities are listed in the table on the following page. The affiliated entities were parent companies and owners that have never exercised control over daily operations or decision making of business operations at the site. ConMet's local facility management conducted all of the control and decision-making

Amsted Industries is privately held; financial statements are not publicly available. Daimler financial statements can be obtained directly from the web site at www.daimler.com

Insurance Policies

Insurance policies for affiliated entities that cover the liabilities of the Respondent are included in Attachment 25.

77. Affiliated Entities of Consolidated Metco, Inc. 13940 North Rivergate Boulevard				
Years of Relation-ship	Owner or Parent Corporation	Nature of Relationship	Percentage Owner-ship	Name and Address of Affiliate's Officers, Directors, Partners, Trustees, Beneficiaries, and/or Shareholders
1964 to 1981	Consolidated Freightways	Parent Corporation	100%	Not available
1981 to 1989	Daimler Benz	Parent Corporation	100%	Not available
1989 to 1990	Hodge/Harman/Oeltjen		33% each	Not available
1990 to 1999	Varlen Corporation	Parent Corporation	100%	Not available
1999 to Present	Amsted Industries Incorporated	Parent Corporation	100%	Not available

78. *If Respondent is a partnership, please describe the partnership and provide a history of the partnership's existence. Provide a list of all current and past partners of any status (e.g., general, limited, etc.) and provide copies of all documents that created, govern, and otherwise rules the partnership, including any amendments or modifications to any of the originals of such documents, and at least five years of partnership meeting minutes.*

Section 9.0 Compliance with This Request

79. Describe all sources reviewed or consulted in responding to this request, including, but not limited to:
- the name and current job title of all individuals consulted;
 - the location where all sources reviewed are currently reside; and
 - the date consulted.

Response 79.

79. Sources Reviewed and Personnel Consulted					
Name	Current Position	Date Consulted	Address	Telephone	Source
Ernie Nimister	Manager of Environmental Compliance and Safety	December 2007 to present	13940 North Rivergate Boulevard Portland, Oregon 97203	503.286.5741	Facility files
Brice Barker	Vice President and General Manager of Plastics and Casting	December 2007 to present	13940 North Rivergate Boulevard Portland, Oregon 97203	503.286.5741	Facility files
Mike Ward	Accounting	February 2008	13940 North Rivergate Boulevard Portland, Oregon 97203	503.286.5741	Facility files
Former Employee	Former Position	Date Consulted	Address	Telephone	Source
Chuck Levin	Maintenance Manager	December 2007 to May 2008	50575 Elder Avenue Scappoose, Oregon 97056	—	Interviews

80. *If not already provided, identify and provide a last known address or phone number for all persons, including Respondent's current and former employees or agents, other than attorneys, who have knowledge or information about the generation, use, purchase, storage, disposal, placement, or other handling of hazardous materials at, or transportation of hazardous substances, waste, or materials to or from, each Property identified in response to Question 4.*

Response 80. The response to Question 79 provides the names and contact information.

81. *If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If the records were destroyed, provide us with the following:*
- a. *the document retention policy between 1937 and the present;*
 - b. *the approximate date of destruction;*
 - c. *a description of the type of information that would have been contained in the documents;*
 - d. *the name, job title and most current address known by you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; the person(s) who would have been responsible for destroying the documents; and the person(s) who had and/or still have the originals or copies of these documents; and*
 - e. *the names and most current addresses of any person(s) who may possess documents relevant to this inquiry.*

Response 81. Relevant documents were provided or cited.

ConMet's document retention policy is included in Attachment 26 and was established in 1995.

ConMet's document retention policy is 5 years.

Certain documents were located that are older than 5 years because they were found in personal files of a former plant manager Don Hill during the preparation of this response.

Environmental records older than 5 years may have been destroyed in accordance with the document retention policy.

82. *Provide a description of all records available to you that relate to all of the questions in this request, but which have not been included in your responses.*

Response 82. The attachments provide numerous documents that the Respondent identified to be related to the questions. The Respondent covered various environmental

categories and subject matter as shown by the names of the electronic folders on the attached compact disk.

Certain documents that provide duplicative information are not included.

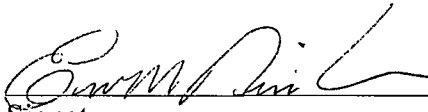
Examples of these documents are the Hazardous Material Certificate of Registration for various years (Question 52). The current certificate is provided in Attachment 24.

In general, MSDSs were provided for the primary raw materials listed in the answer to Question 21 due to the large number of MSDSs on file. MSDSs for other material are not provided but are available.

DECLARATION

I declare under penalty of perjury that I am authorized to respond on behalf of Respondent and that the foregoing is complete, true, and correct.

Executed on May 14, 2008.


Signature

ERNEST M. NIMISTER
Type or Print Name

Manager of Environmental Compliance & Safety
Title

Mailing Address:

P.O. Box 83201
Portland, OR 97283